

# Midia Gas Development Project

## Stakeholder Engagement Plan (SEP) – 2021

Black Sea Oil & Gas SA

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## ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Definition
Aarhus Convention	The Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998.
BSOG	Black Sea Oil & Gas
CLO	Community Liaison Officer
DDBRA	Danube Delta Biosphere Reserve Administration
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
EU	European Union
ESIA	Environmental and Social Impact Assessment
AESIA	Additional Environmental and Social Information and Assessment
FEED	Front End Engineering Design
GTP	Gas Treatment Plant
GSP	Grup Servicii Petroliere
LPA	Local Public Authorities
LRP	Livelihood Restoration Plan
LRR	Livelihood Restoration Report
MEG	Monoethylene glycol
MGD/MGD Project	Midia Gas Development/Midia Gas Development Project
NGO	Non-Governmental Organisation
NTS	National Gas Transmission System
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
TEG	Triethylene glycol
TRANSGAZ	National Gas Transmission Company

# 1 INTRODUCTION

## 1.1 Scope and Objectives of the Stakeholder Engagement Plan

Stakeholder engagement is a key element in building strong, constructive and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts. It aims to inform stakeholders about the potential environmental and social impacts related to the project through appropriate disclosure of information, to ensure their perceptions of the proposed development are as accurate as possible, to consult with them to obtain feedback, and to provide a mechanism for resolving any concerns or complaints they might have.

The Stakeholder Engagement Plan (SEP) is a guiding document that maps the main categories of stakeholders who will be meaningfully engaged within the development and implementation of a project. This SEP highlights the way the company plans to communicate with these stakeholder groups who may be affected by or interested in BSOG operations and activities. It focuses on:

- Identification of stakeholders who are likely to be affected and have an interest to the project;
- Establishment of engagement methods that are suitable for each identified category of stakeholder;
- Documentation of previous engagement activities and stakeholder feedback;
- Development and implementation of the future stakeholder engagement programme, and methods of engagement;
- Introduction of the project's grievance mechanism;
- Monitoring and evaluation of engagement actions, and;
- Roles and Responsibilities

This SEP is prepared in relation to the Midia Gas Development (MGD) Project which is currently in the process of being worked up and implemented by Black Sea Oil & Gas SRL (BSOG). It sets out the planned programme for disclosure of project information and consultation with stakeholders, as well as the methods for recording and addressing comments and grievances from various stakeholders.

While the local regulatory framework in Romania only requires an Environmental Impact Assessment (EIA), the project's initiator, BSOG, has decided to examine the social implications of MGD as per best international practice. In light of the planned Environmental and Social Impact Assessment (ESIA) process, this document establishes the basis of the stakeholder engagement programme for the whole project. BSOG is committing to support all the engagement activities included in the SEP and to allocate sufficient resources (human and financial) in order to ensure its implementation.

The SEP is a 'live' document that will be progressively developed through updated versions in line with the phases of the MGD Project. The SEP will be made publicly available on BSOG's website and will also be made accessible to local communities as part of the project information disclosure policy and programme as described below.

BSOG will respect individual stakeholders' Right to Privacy which is relevant to this SEP in regard to information relating to personal or private affairs and the protection of communications, including grievances.

The current version of SEP has been developed during the construction phase.

Given the changes in the Project construction schedule, the execution of construction works related to the beach crossing partly overlapped with the tourist season. In particular, the HDD site preparatory activities started end of June 2020, and continued until early September 2020. Actual HDD drilling and pipe installation works were however performed between 11 September and 8 October 2020, i.e. mostly after the end of the touristic season (2020 touristic season at Vadu Beach started late, at 1st of June and ended in 15th of September).

Given the above, the requirement to develop and implement adequate livelihood restoration planning measures was triggered. However, circumstances beyond BSOG control and mainly triggered by the restrictions imposed as result of the COVID-19 outbreak, prevented the development and implementation of the Livelihood Restoration Plan (LRP) due to the following:

- The lockdown including strict travel restrictions and social distancing measures did not allow the development of an LRP upfront of the initiation of the preparatory works at the beach crossing area (also referred to as “the HDD site” throughout the document). Hence the need for an alternative approach allowing adequate response to a constantly changing course of events.
- The evolution of the touristic season was unpredictable and consequently the full impacts of the Project on tourism were unknown and could not be evaluated before the initiation of the Project works at the beach area.

In this context, to ensure that the commitment to compensate for any Project-induced loss of income or for Project-induced loss of other means of livelihood is attained, a number of measures were undertaken as indicated below.

An Assessment of potential economic displacement situations was initially developed with the following objectives:

- assess the potential economic displacement aspects identified in the LRF;
- identify all potential economic displacement situations related to the MGD Project considering the new construction schedule;
- identify/update the Project-affected persons/groups (PAP), and
- define required measures to address potential social impacts experienced by the PAPs in line with national requirements, LRF, EBRD PR5 and IFC PS5.

The assessment resulted in the identification of a number of actions that needed to be implemented by BSOG during the construction works executed during the touristic season as follows:

- the social impacts associated with the Project activities developed during the touristic season to be monitored;
- all impacts and their magnitude to be documented;
- additional data to be acquired based on consultations with PAPs from the two categories of economic displacement situations:
  - owner of restaurant - Cherhanaua Bosoancă, and
  - owners/users of land situated in the proximity of roads and land used for the Project.

## 1.2 Brief Project Description

BSOG is the titleholder (together with Petro Ventures Resources SRL and Gas Plus Dacia SRL) and operator of the Concession Agreement for Petroleum Exploration, Development and Production in Blocks XIII Pelican and XV Midia, Contract Area B, located on the continental shelf of the Romanian Black Sea.

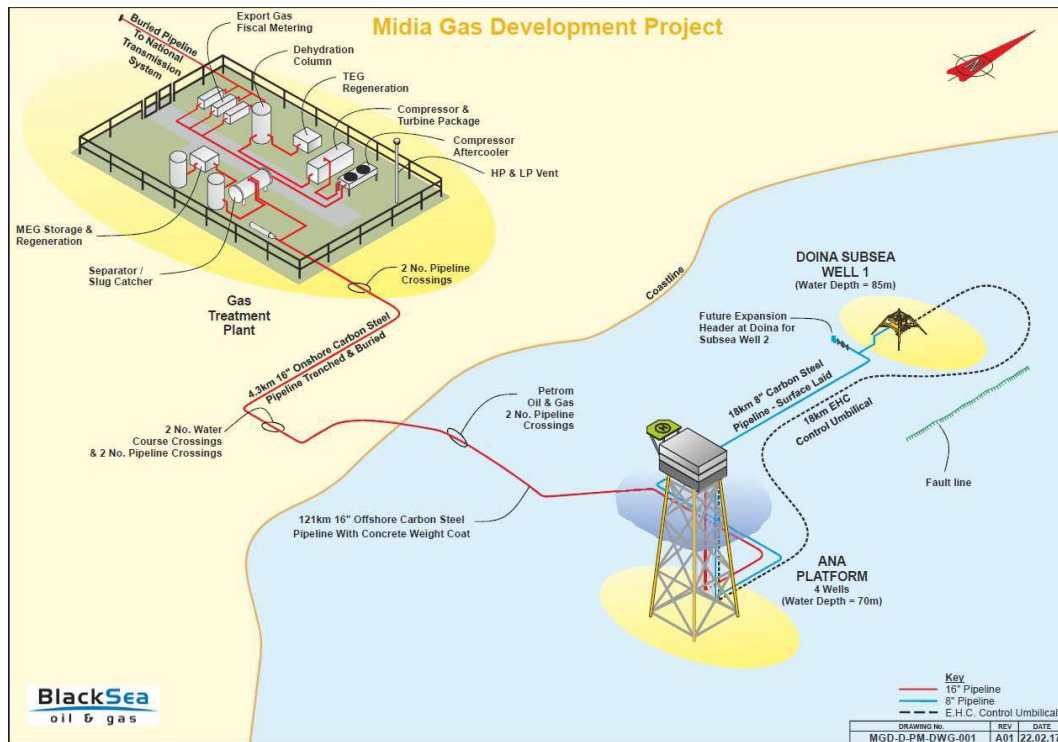
The Midia Gas Development (MGD) Project will produce and process gas from the Ana and Doina fields located in the offshore XV Midia Block.

The MGD Project consists of drilling four wells at the Ana field, where a small, normally unmanned platform will be installed to house the wellheads and production control facilities. A further well will be drilled at the nearby Doina field as a subsea development, with gas being routed to the Ana field platform via a subsea 18 km-long pipeline. The gas will then be brought to shore through a single 126 km pipeline (an upstream pipeline) out of which 121 km is the offshore segment of the pipeline which will have a landfall at Vadu, Corbu Commune, Constanța County and a 4.3 km onshore segment of the pipeline, from the landfall site to the new gas treatment plant (GTP) in the Vadu area where it will be treated prior to delivery into the national gas transmission system (NTS).

The concept of the MGD Project is presented in Figure 1.

### **Figure 1 Concept for the Midia Gas Development Project**





The Project is divided into three packages as described below.

### 1.2.1 Ana offshore wellhead platform, including topsides and substructure

The facilities at the Ana wellhead platform comprise:

- 4 x platform wells;
- pipework fully rated to well closed in tubing head pressure;
- cold vent;
- helideck;
- chemical storage and injection pumps for mono ethylene glycol (MEG);
- temporary refuge/equipment room;
- lifeboat;
- facilities to enable temporary installation of pig receivers and pig launchers;
- crane; and
- minimal ancillary facilities.

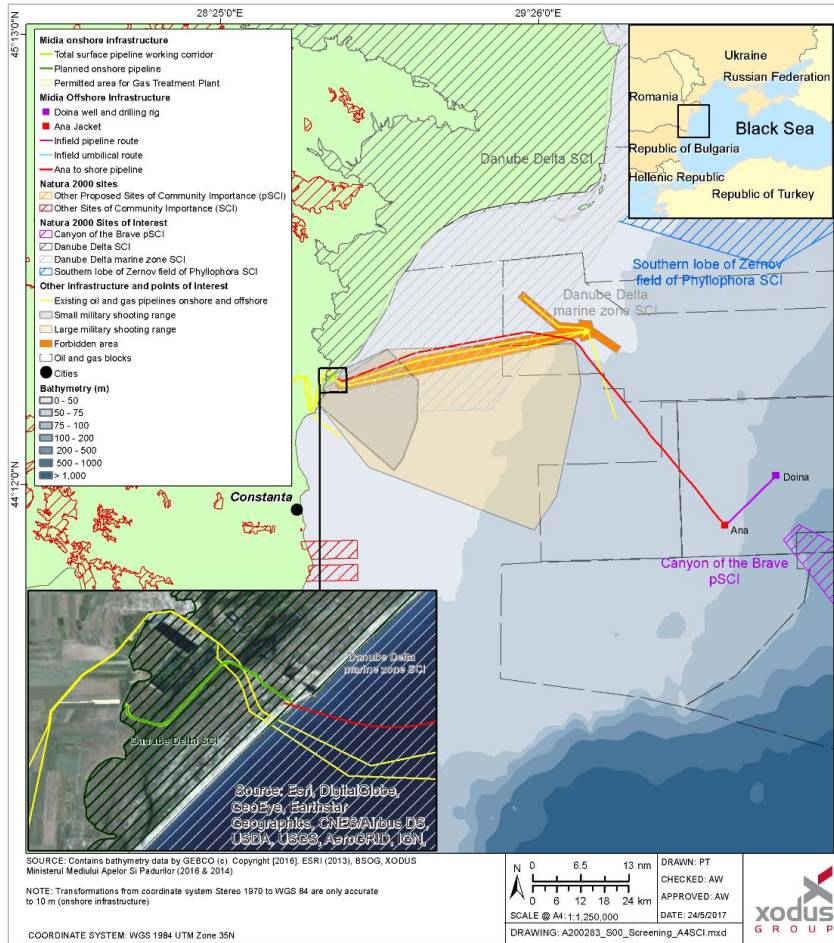
### 1.2.2 Subsea infrastructure including Doina subsea facilities, Ana-Doina infield pipeline and pipeline to shore, including beach crossing

The facilities for the offshore subsea infrastructure are:

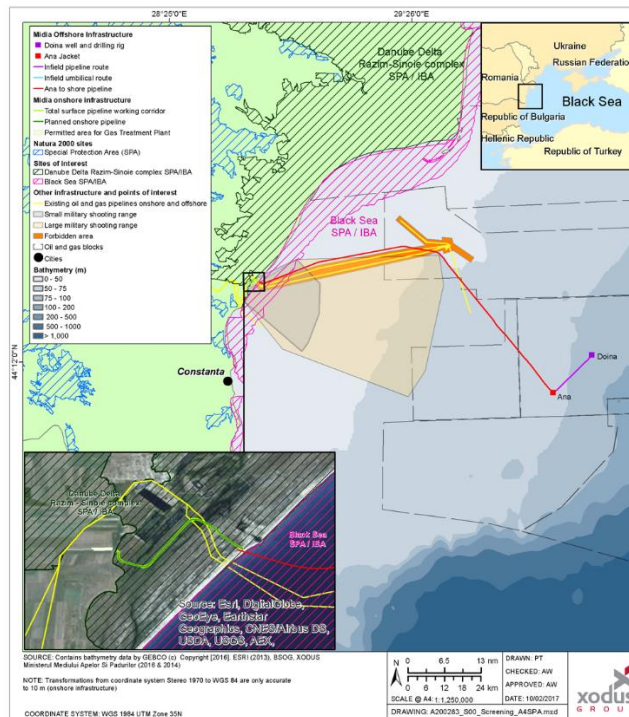
- Doina: Up to 2 x subsea wells in a daisy chain arrangement controlled via an electro-hydraulic-chemical umbilical from the Ana platform (initial development is 1 x Doina subsea well);
- Doina to Ana Platform infield pipeline: 8-inch carbon steel pipeline with no concrete coating, continuously inhibited against hydrates with MEG
- Ana Platform to shore pipeline: 16-inch steel pipeline with a concrete coating for stability, continuously inhibited against hydrates with MEG; and
- Beach crossing by the pipeline: horizontal directional drilling (HDD).

The offshore segment of the pipeline will cross: Natura 2000 areas of ROSCI (Romanian Site of Community Importance) 0066 Danube Delta - marine area; and ROSPA (Romanian Special Protection Area) 0076 Black Sea, as well as the economic area of the Danube Delta Biosphere Reserve (in Romanian: "Rezervația Biosferei Delta Dunării").

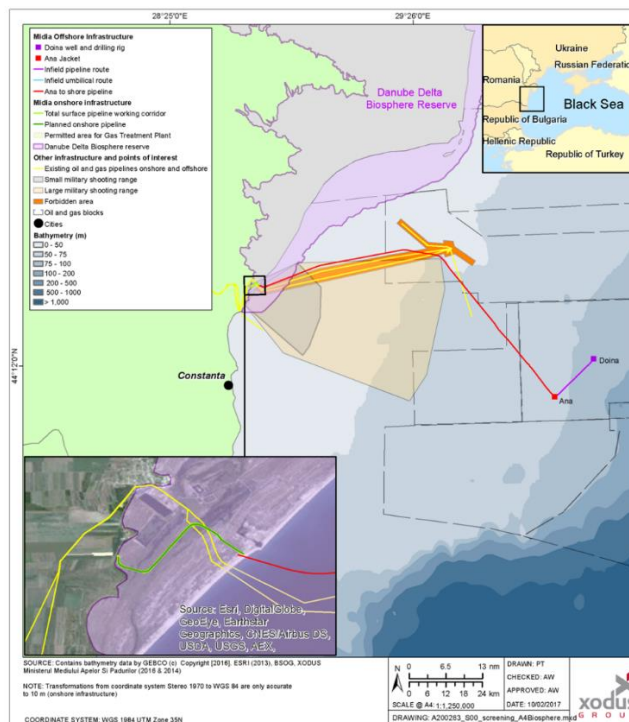
**Figure 2 Sites of Community Importance (SCI) and Proposed SCI**



**Figure 3 Special Protection Areas (SPA) and Important Bird Areas (IBA)**



**Figure 4 The Danube Delta Biosphere Reserve**





**Table 1 Protected sites in the vicinity of the MGD Project, offshore section**

Site name	Site code	Location relative to MGD Project
Danube Delta marine zone SCI (Delta Dunarii – zona marina)	ROSCI0066	Extends into offshore; gas pipeline crosses site over a distance of ~52 km
Black Sea SPA (Marea Neagra)	ROSPA0076	Extends into nearshore; gas pipeline crosses site over a distance of ~12 km
Southern lobe of the <i>Phyllophora</i> field of Zernov SCI (Lobul sudic al Câmpului de Phyllophora al lui Zernov)	ROSCI0413	Offshore; 32 km to north from landfall
Canyon of the Brave SCI (Canionul Viteaz)	ROSCI0311	Offshore; 12.5 km to south east from Ana Platform
Danube Delta Biosphere Reserve	n/a	The MGD pipeline crosses through the southern tip of this site, ~12 km through the marine economic area and ~4.1 km through the onshore economic area.
Black Sea IBA	RO082	Extends into nearshore; offshore pipeline crosses through over a distance of ~12 km

The offshore segment of the pipeline will cross a crude oil pipeline and a natural gas pipeline owned by OMV Petrom SA.

### 1.2.3 Gas Treatment Plant (GTP) and associated onshore pipeline

The onshore facilities of MGD Project are:

- Trenched and buried 16-inch carbon steel pipeline, continuously inhibited against hydrates with Monoethylene glycol (MEG); and
- Gas Treatment Plant: pig receiver, slug catcher/separator, single stage turbine driven compressor (with scrubber and air cooled after cooler), triethylene glycol (TEG), dehydration of gas, fiscal metering, MEG regeneration and storage, control room, power generation, utilities, cold vent, etc.

The onshore segment of the pipeline will cross the non-built-up area of the Administrative Unit of Corbu Commune located in Constanta County.

Two settlements are in proximity to the Project (Corbu Village and Vadu Village). Vadu is the nearest settlement, located approximately 1.9 km from the GTP.

**Figure 5 Settlements and structures located near the MGD Project**



The onshore segment of the pipeline will cross: Natura 2000 areas of ROSCI 0065 Danube Delta; ROSPA 0031 Danube Delta and Razim-Sinoie Complex; ROSPA 0076 Black Sea, as well as the economic area of the Danube Delta Biosphere Reserve (in Romanian: “Rezervația Biosferei Delta Dunării”).

Also, the ROSPA 0066 Tasaul and Cobu lakes area is located approximately 6.5 km from the GTP. A 16 m-wide corridor will be required for the construction of the underground onshore pipeline segment. The construction corridor will cross seven local unpaved access roads (De541/31/A, De541/31/B, De 539/80, De 539/79, De 539/78, De 522/9 and De 265). The project will follow the international standards and national legal requirements for all crossings to ensure Environmental and Social impacts are mitigated. After the onshore pipeline segment’s construction, the access roads crossings will be restored to the initial conditions.

The onshore segment of the pipeline will under-cross the crude oil pipeline and a natural gas pipeline owned by OMV Petrom SA located onshore. Also, the onshore pipeline will cross two Rompetrol wastewater pipelines and the Balta Mare and Balta de Mijloc wetlands.

A number of onshore natural protected areas are within the project area as indicated in Table 2 below.

**Table 2 Protected sites in the vicinity of the MGD Project, onshore section**

Site name	Site code	Location relative to MGD Project
Danube Delta SCI (Delta Dunarii)	ROSCI0065	Onshore, pipeline crosses southern tip of site
Danube Delta and Razim-Sinoie Complex SPA (Delta Dunarii Complexui Razim Sinoie)	ROSPA0031	Onshore, the pipeline crosses the southernmost tip of site; however, the GTP is located outside of this site
Lakes Tasaul – Corbu Lacurile Tasaul – Corbu	ROSPA0060	Onshore; approximately 6 km to the south west of onshore component of MGD Project
Dobrogea Gorges Cheile Dobrogei	ROSPA0019	Onshore; approximately 15 km to the west of onshore component of MGD Project
Danube Delta IBA	RO081	Extends from coastline into nearshore; pipeline crosses through over a distance of ~12 km
Lake Tasaul IBA	RO109	Onshore; approximately 6 km to the south west of onshore components of MGD Project
Dobrogei Gorge IBA	RO108	Onshore; approximately 15 km to the west of

		onshore components of MGD Project
Danube Delta Ramsar Site	RO521	Onshore, the pipeline crosses the southernmost tip of site; however, the GTP is located outside of this site

The project obtained all permits required for construction.

## 1.3 Current project status and construction works foreseen for 2021

### 1.3.1 Current project status

As of March 2021, the following main activities were performed by BSOG and its contractors:

- construction of gas treatment plant (ongoing)
- fabrication of the jacket for Ana Platform completed and loaded for sailing out to the Ana location, fabrication of the topside in progress.
- preparation of access road for HDD (completed)
- preparation of the HDD site (completed)
- beach crossing works with HDD (completed)
- HDD site demobilization (completed)
- preparation of access road to onshore pipeline corridor (completed)
- laying out and welding of onshore pipeline (ongoing).
- laying out the offshore pipeline (completed).
- Testing of the offshore pipeline (completed).

A photo report of the works carried out in 2020 can be found in Appendix I.

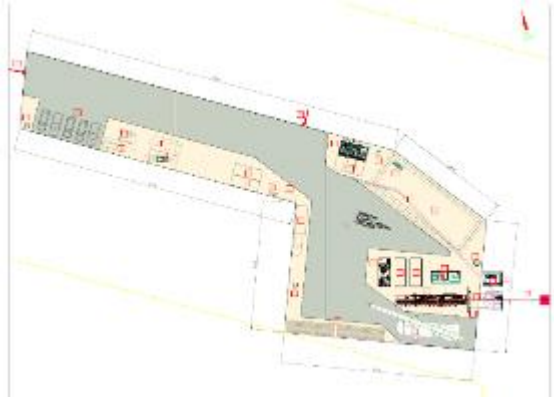
The impacts of the above-indicated activities have been fully assessed in the Project ESIA package.

The beach crossing works were performed by employing the Horizontal Directional Drilling (HDD) technology and consisted of a series of activities that can be summarized as follows:

- preparatory activities related to access road rehabilitation, construction site arrangement and installation of necessary equipment and machinery
- horizontal drilling
- pipeline pulling into the drilled borehole
- rehabilitation of construction site and access road.

The construction site had a total perimeter of approximately 40 m x 30 m and was located nearby Vadu Beach at 150 m inland from the shoreline, as indicated in the below figure:

**Figure 6 HDD construction site layout (source: Google Earth and MGD-E-GSPOS009-CN-DLP3-001-B2 Jobsite Layout)**



### 1.3.2 Construction works foreseen for 2021

The following construction works are foreseen for 2021:

#### **ONSHORE**

- Onshore pipeline laying and testing
- Crossing of Balta Mare
- Completion of the construction works of the Gas treatment Plant in Vadu

#### **OFFSHORE**

- Transport and installation of the Jacket
- Transport and installation of Ana Platform
- Offshore pipeline laying and testing – completed
- Drilling of 5 development wells
- Start of the gas extraction process

## 2 REGULATIONS AND REQUIREMENTS

### 2.1 National Requirements

At national level, there are no specific requirements for preparing a dedicated Stakeholder Engagement Plan. Nevertheless, some provisions for stakeholder engagement are included in several regulations and procedures, including:

- The Romanian Constitution, which stipulates in article 31 (1) that “a person's right of access to any information of public interest cannot be restricted” and in article 31 (2) that “the public authorities, according to their competence, shall be bound to provide for correct information of the citizens in public affairs and matters of personal interest”;
- Law no. 86/2000, for ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, signed in Aarhus on 25 June 1998 (Aarhus Convention).
- Law no. 544 of October 12th, 2011 regarding the free access to information of public interest, which defines and details the free access of any person to any piece of information of public interest, which, as a general principle, constitutes one of the fundamental principles of the relationship between citizens and public authorities in accordance with the Constitution of Romania and with the international undertakings ratified by the Parliament of Romania.
- Law no. 544/2011 stipulates further that the public authorities or institutions will ensure that access to information of public interest shall be done ex officio or upon request, through the intermediary of

the department for public relations or through the intermediary of the person appointed for this purpose.

- Government Decision no. 878/2005 on right to access to environmental information transposes EU Directive 2003/4/CE from 28 January 2003 (on right to access to environmental information and repealing the Directive no. 90/313/CEE) and ensures the right to access environmental information held by or for the public authorities and sets out the conditions, general terms and ways to exercise that right.
- Emergency Government Ordinance no. 195/2005, related to the environmental protection, as amended from time to time, clearly stipulates in article 5 that the state recognizes the right of any person to an “ecologically healthy and balanced environment” and for this purpose, the state warrants, inter alia, free access to environment related information, including the right of any person to be consulted during a process of making environment-related decisions (i.e. legislation, plans and programs) and the right to access to justice.
- Further, article 20 of Emergency Government Ordinance no. 195/2005 clearly stipulates that the Competent Authority for Environmental Protection together with all other local and central public authorities, if the case, will ensure proper access to information, participation of the public in specific activities related to decisions and access to justice in accordance with the requirements of the Aarhus Convention;
- Government Decision no. 445/2009 on environmental impact assessment pertaining to certain public and private projects. In accordance with the stipulations of this Decision, the relevant information has to be made publicly available by the investor and/or the national authorities during each of the EIA stages listed in article 6 of the same. Public Consultations and open disclosure of documentation connected with the Project have to be carried out and financed by the Investor in close connection with the guidance given by the relevant authority and consistently with the requirements of the relevant Romanian legislation (see in this respect, art. 16 of the Decision). We note that the provisions of this Government Decision were followed in relation to the MGD Project when the regulatory process was performed. Starting with 09 January 2019 the provisions of this Decision were replaced by the ones of Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects.
- Order 1284/2010, the Methodology for Environmental Impact Assessment for Public and Private Projects, which details the necessary stages for the performance of the EIA procedure, as listed in article 6 of Government Decision no. 445/2009. We note that the provisions of this Order were followed in relation to the MGD Project when the regulatory process was performed. Like in case of Government Decision no. 445/2009, starting with 09 January 2019 the provisions of this Order were replaced by the ones of Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects.
- Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects. This law transposed the new EIA Directive and replaced Government Decision no. 445/2009 and Order no. 1284/2010.
- Order no. 2701/2010, the Methodology regarding the mechanism of information and consultation of the public on the occasion of preparing or revising the zonal planning and urbanism plans enacted by the Ministry for Regional Development and Tourism, which provides the legal framework for performing the information disclosure and public consultation as a prerequisite for approving any urbanism and zonal planning documents.
- Law no. 52/2003 on decisional transparency in public administration. This law has the role to enhance the accountability of government to the citizen and the beneficiary of the administrative decision, and to increase the involvement of citizens in decision-making processes of the administrative and legislative drafting process, to enhance transparency across government.
- Order no. 863/2002 on approval of the Methodological guidelines applicable to the stages of the environmental impact assessment procedure. Like in case of Government Decision no. 445/2009,



starting with 09 January 2019 the provisions of this Order were replaced by the ones of Law no. 292/2018 on the environmental impact assessment pertaining to certain public and private projects.

- Law no.185/2016 regarding certain measures required for the implementation of petroleum operations by the titleholders of petroleum agreements relating to offshore petroleum blocks. The law clearly sets out the way in which landowners are to be engaged during the development and implementation of an offshore oil and gas project.

## 2.2 European Bank for Reconstruction and Development (EBRD) Requirements

According to the EBRD, stakeholder engagement is important for building strong, constructive and response relationships with all interested and impacted persons/institutions. EBRD's Performance Requirement 10 (PR10) states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. Also, EBRD's Performance Requirement 8 (PR8) states that consultation with stakeholders and affected communities should be made in the context of cultural heritage issues.

In the event that national laws are insufficient or there are significant discrepancies between national and PR 10 provisions, then the following principles should be considered:

- Promoting transparent communication between the project promoter, its workforce, the local communities directly affected by the project, and other interested stakeholders;
- The involvement of the stakeholders has to be a process free of manipulation, interference, coercion and intimidation;
- The involvement of the stakeholders has to be adapted on the basis of the project impacts over them (direct/indirect) and their level of influence and interest towards the project. Vulnerable groups will be identified and specific actions will be undertaken to ensure that the Project will not contribute to the existing vulnerabilities and possible barriers to their participation in the engagement process are eliminated;
- The involvement of stakeholders is a process which must take place in the early stages of the project, and continue throughout the entire life of the project; and
- Ensuring access to an appropriate, fair complaints management mechanism for stakeholders to submit their questions, concerns or grievances about the project.
- In line with EBRD's Performance Requirement 1 (PR1), together with PR10, engagement with the project stakeholders is an integral part of the project environmental and social impacts assessment, management and monitoring processes. PR1 requires the identification of the project's stakeholders and the design of a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project. PR10 states that the process of stakeholder engagement should begin at the earliest stage of project planning and continue throughout the life of the project.

## 3 STAKEHOLDER IDENTIFICATION AND MAPPING

Mapping (classifying) stakeholders is an on-going process throughout the life of the project, with some parties being identified in the initial phase of the implementation, while others are added as they gain influence or interest in the project. Stakeholders are individuals or organizations that:

- Are directly or indirectly affected by a project (or company's operations);
- Have "interests" in a project or a company or its area of influence that determine them as stakeholders; and/or
- Have the potential to influence project outcomes or company operations.

In the current project context, several key stakeholders have already been identified, while others will be included in future project stages.

The stakeholder's identification process started at early Project preparation stages and was performed by

BSOG employees during direct meetings with authorities, key stakeholders and representatives of local community (Corbu and Vadu). The stakeholders have been identified:

- During the preparation of the social baseline;
- Via direct meetings with the BSOG team;
- Based on the available documentation and research;
- Based on the observation notes made during the site visits; and
- Based on previous experience with similar oil and gas projects and on local knowledge.

As part of the Project environmental and social impact assessment process, BSOG has also performed a vulnerability assessment as detailed in the Additional Environmental and Social Impact Assessment (AESIA). This assessment was based on the analysis of the local context performed as part of the impact assessment process and summarized in the ESIA Package (including the project ESIA and AESIA reports). The assessment took into consideration the socio-economic profile of the community (looking at the structure of population, their level of education, age, ethnicity, etc) in order to be able to understand if there are vulnerable persons living in the impacted communities. Further on, the assessment looked at the project activities that may potentially generate situations of vulnerability (i.e. land acquisition, traffic, dust, noise, beach crossing, and offshore activities). According to the vulnerability assessment performed, there are no persons or groups of persons in the communities that may be differentially or disproportionately affected by the project construction and operation. Therefore, no **project vulnerable groups**<sup>1</sup> were identified in relation to the project. Nevertheless the children enrolled in schools in Corbu and Vadu villages are considered as being **vulnerable persons**<sup>2</sup> in relation with the project and specific measures to address associated risks and impacts on them were defined and will be implemented during project execution in the frame of the environmental and social management system.

The following list presents the key stakeholders who were actively engaged in all project (preparation, permitting, construction) phases:

- National Authorities – Ministry of Environment (through the Environmental Protection Agency of Constanta and Danube Delta Biosphere Reserve Administration), Ministry of Culture and National Identity (through the Direction of Culture of Constanta County), Ministry of Waters and Forests (through the Romanian Waters National Authority), National Committee of the Coastal Area, Romanian Intelligence Service, Ministry of Defence (through the General High Staff), Ministry of Interior, National Agency for Mineral Resources, Hydrographic Marine Directorate, Forests' National Authority, Office of Cadastre and Real Estate Publicity, National Energy Regulatory Authority.
- Regional/Local Public Authorities (LPAs) – Local Council and the Mayor's Office of Corbu, Environmental Protection Agency (EPA) of Constanta, Land Improvement Agency, Direction for Agriculture of Constanta, Direction of Public Health of Constanta, Prefecture of Constanta, Environmental Guard of Constanta, County Council of Constanta, State Inspectorate for Emergency Situations – Dobrogea.
- Other central authorities involved in the upcoming permitting process will also be considered as stakeholders and added in the updated version of the SEP.  
Beside the above, there are other categories of stakeholders who will be directly or indirectly engaged either at this stage or in future stages. These include the following key stakeholder groups for the overall project:
  - Fishermen and Fishery organisations representing those who perform fishing activities in the project area.
  - Landowners/users in the proximity of the project.
  - Persons living in houses located along the roads that will be used for transporting materials and equipment
  - Tourists that are using Vadu beach

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<sup>1</sup> In line with the EBRD requirements we have defined **project vulnerable groups** and persons as “people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits”.

<sup>2</sup> **Vulnerable persons** are defined as “people living below the poverty line, the landless, the elderly, women and children-headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and/or international law”

- Owners of the restaurants located on or near Vadu beach, in the proximity of the future construction corridor.
- Women, children, elderly people and any other vulnerable people who live in the project affected villages including those villages affected by the project traffic, Transgaz pipeline project and by construction and operation of associated facilities and construction camp.
- Other businesses in the region – especially other oil and gas companies that are present in the same general area as BSOG (either offshore or onshore)
- Non-governmental organizations (NGOs) – active both at international/national and/or regional/local level that are working in the fields of environmental protection, gender equality and social protection, forestry, nature conservation and agriculture.
- Media – represented by both national and local television, radio stations, newspapers and social media and other online publications.
- Community Leaders and Opinion Makers – high profile local leaders (mayor, priest, etc.)
- Public at large – all interested persons that have an interest in the project.

There are also two categories of stakeholders that are considered to be internal to BSOG which shall be taken into account. The first category is represented by BSOG employees and contractors and worker organisations, while the second one is represented by BSOG shareholders/investors.

By plotting influence together with impact/interest on a matrix diagram and taking due account of further criteria such as expertise (i.e. knowledge to contribute and legitimacy) and the stakeholders' willingness to engage, the relative needs of key stakeholders in terms of the level and type of consultation and engagement are determined and can therefore be properly planned by BSOG throughout the project lifecycle.

## 4 STAKEHOLDER ANALYSIS

Stakeholder analysis is achieved by assessing the position of each stakeholder in the context of the project preparation phase.

Each identified stakeholder has been analysed from following perspectives: the project impacts on them (direct / indirect impacts), their estimated interest in the project and their potential influence over the project. Table 3 presents the main outcomes of this analysis.

**Table 3 Results of Stakeholder Analysis**

External Stakeholder	Potential Interest on the project
<b><i>Directly impacted stakeholders</i></b>	
Affected communities (Corbu and Vadu villages)	Interested in understanding the benefits and project impacts, as well as measures to reduce the negative ones.
Local key opinion leaders (Mayor, Vice Mayor, members of the County Council, priest, school director and teachers)	Interested in obtaining timely and effective information on project implementation and maximize the BSOG engagement at community level, via their CSR programme
Fishermen organisations	Interested in understanding the restrictions for fishing, if the case and how to overcome such restrictions.
Tourists	Interested in using the beach and having no disturbance during their holiday.  (It should be noted that within the area of the Delta Danube Biosphere Reserve, informal touristic activities are taking place. BSOG is considering all touristic activities within the project area and tourists are considered key stakeholders, especially for the beach crossing section of the project)
Local businesses (especially those focused on tourism) and other businesses in the area	Interested in understanding the impacts of the project on their business activities.
Land owners/users – neighbouring BSOG land	Interested in having no disturbances on their property during construction and operational periods.
Vulnerable groups: children, elderly people, disabled and any other vulnerable people who live in the project affected settlements including those affected from traffic and associated facilities	Reduce any risks for accidents during transportation
New neighbours to the GTP (farm, guest house currently being built)	Interested in understanding the impacts of the project on their business activities.
<b><i>Indirectly impacted stakeholders</i></b>	
National Authorities	Project to be developed and implemented according to national and international standards.
Regional/ Local Public Authorities	Project to be developed and implemented according to national standards. Local authorities are interested in obtaining benefits for the local community.
Non-Governmental Organisations	Interested in monitoring and oversight of how the project will comply with the environmental and social provisions and commitments.

External Stakeholder	Potential Interest on the project
Mass media	Interested in understanding the project and monitoring how all provisions are complied with, especially the ones related to environment and social safeguards.
Public at large	Interested in understanding the benefits and disadvantages of the project.
Employees of BSOG	Being informed about the project Receive timely payments Good working conditions
Contractor employees	
Employee Organisations (trade unions)	Protection of workers Good working conditions
MGD gas buyer (Engie)	Interested in buying gas from the project installation.
Main contractor (GSP)/ Sub-contractors	Interested in fulfilling contractual obligations and respecting deadlines.
IFIs	Interested in implementing the project according to the time schedule and recovering loans - in case of creditors, and in maximizing investments - in case of investors.
Transgaz	Owner of the associated facility and operator of national gas transmission system.

**Note: If you are not on the list and would like to be kept informed about the project, please liaise with BSOG by using the contact details provided in section 7 of this document.**

## 5 PREVIOUS ENGAGEMENT ACTIVITIES

Previous engagement activities have been related mainly to (1) the permitting process that started in 2014 and successfully finalized in 2019 for the construction phase of the project, (2) the land acquisition process that was finalised in 2016, (3) the ESIA development process, (4) during construction works, and (5) implementation of Corporate Social Responsibility (CSR) programme.

BSOG Community relations team was initially appointed on 13 March 2017 and communicated to Corbu Municipality through formal letter. The team initially comprised of: the Communications & CSR Manager, HSE Manager, Regulatory Manager. The BSOG HR Manager also joined the team in December 2018 and this update was communicated to Corbu Municipality during a meeting with the Corbu Local Council members on 18<sup>th</sup> December 2018. In 2019 a Community Liaison Officer has also joined the Community relations team.

BSOG has developed the first SEP in 2016. Since then, all its engagement activities are documented and properly recorded. This chapter presents the engagement activities performed by BSOG in 2020. Detailed description of actions performed in 2019 is provided in Appendix C.

Annual reports on stakeholder engagement activities performed are also disclosed on BSOG website: <https://www.blackseaog.com/sustainability/environmental-policy/>.

As specific cultural feature of the project-area countryside, rural communities are led and influenced by key opinion leaders enjoying special respect from the community members. Such opinion leaders include the Mayor, Vice Mayor, members of the Local Council, the priest, school directors and teachers. During the engagement performed to date, the preference of the local community members was to express their enquiries with respect to the MGD Project through the key opinion leaders who typically acted as ambassadors between the community and the project.



BSOG's community engagement strategy acknowledged the above-indicated and held several meetings with such key stakeholders to present the MGD project, progress status, principles of running the business, implications for the community and understand the community needs. Minutes of these meetings are available upon request.

Engagement activities for 2020 have mainly consisted of the engagement of project affected persons (PAPs) that could potentially be affected by the start of the HDD beach crossing, such as tourists and business owners in the beach area, the implementation of the Corporate Social Responsibility (CSR) program, and the launch event that was organized on the 17<sup>th</sup> of September, to mark the start of the work on the pipeline.

All engagement activities performed in 2020 have been organized while taking into consideration the restrictions imposed by the COVID-19 pandemic. As expected, the pandemic has limited the number and scope of the engagement activities (public events being banned), yet BSOG has undertaken considerable efforts to engage the stakeholders in a meaningful way while also taking into consideration their wellbeing and potential risks.

### 5.1. Engagement with project affected persons (PAPs)

The start of the HDD work within the tourist season has provided a number of challenges in terms of stakeholder engagement, since it is the most socially active period of the year in Vadu, which is an attractive tourist destination for those seeking a more "wild" beach. More so, due to the international travel restrictions imposed by the COVID-19 pandemic, the Romanian seaside has seen in 2020 an increase in the number of tourists, even though the season has started with a slight delay, the tourist activities having been allowed only at the start of June, while the summer tourist season would otherwise usually start in the 1st of May.

A Livelihood Restoration Framework (LRF) has been prepared in 2019 in order to detail all the possible project impacts on the community and identify the affected persons, and a Livelihood Restoration Report (LRR) has been prepared in the beginning of 2021 in order to evaluate the Projects' compliance with the LRF and any potential remedial actions.

Table 4 below details all the PAPs that were identified in the process and the engagement activities that have been undertaken by BSOG.

**Table 4. Engagement with Project Affected Persons**

Stakeholder	Engagement method	Main results	Responsibility
Tourists	<p>Flyer and brochure distribution</p> <p>5 Beach surveys</p> <p>2 Information boards installed at the HDD site perimeter</p> <p>Daily (Monday to Friday) reporting on beach occupancy next to HDD site</p> <p>Weekly opinion survey among tourists</p>	<p>The surveys indicate that tourists were not disturbed by the presence of the site, nor they perceived any annoying noise from the site, machinery, or workers.</p> <p>No interaction between tourists and workers have been recorded.</p>	<p>BSOG Communications &amp; CSR Manager</p> <p>CLO</p>
	<p>Grievance Mechanism in place.</p> <p>7 Grievance boxes installed as follows:</p> <ol style="list-style-type: none"> <li>1. Corbu Mayor House</li> <li>2. Agigea shipyard</li> <li>3. GTP</li> <li>4. Corbu Cultural Center</li> <li>5. Vadu Cultural Center</li> <li>6. Vadu beach, near HDD site</li> <li>7. Vadu Beach, HDD site</li> </ol>	<p>No grievances have been received from the tourists.</p>	<p>BSOG Communications &amp; CSR Manager</p> <p>CLO</p>
Owner of the restaurant on Vadu beach	<p>The owner of the Bosoanca restaurant has been engaged by BSOG on several occasions.</p> <p>An attempt has been made to contract the restaurant to provide food for the workers, but an agreement on the price could not be reached.</p> <p>BSOG has used the services of the restaurant occasionally and monitored the restaurant occupancy during the HDD work.</p> <p>The owner of the restaurant has been engaged several times. BSOG has provided information materials and updates regarding the project status.</p> <p>The owner of the restaurant has been</p>	<p>No grievances have been received from the restaurant owner.</p> <p>While BSOG has attempted on a number of occasions to engage with the owner, he has remained hostile towards the Company and couldn't reach any agreement.</p>	<p>BSOG Communications &amp; CSR Manager</p>

Stakeholder	Engagement method	Main results	Responsibility
	interviewed for the LRR purposes to identify and potential impact on the restaurant's activity.		
Owners of the tourist accommodation facilities from Vadu village	<p>Owners of the tourist accommodations in Vadu and Corbu have been engaged as part of the LRF elaboration process.</p> <p>Face to face interviews have been performed in May 2020.</p> <p>The CLO has provided informative materials to the owners of accommodation units in the area</p>	<p>The owners have confirmed that there are not expected Project impacts on their businesses and that despite the COVID restrictions, they were at the time almost fully booked for the upcoming tourist season.</p> <p>No grievances have been filed by accommodation owners.</p>	<p>BSOG Communications &amp; CSR Manager</p> <p>CLO</p>
Fishermen and fishermen organization	Local fishermen organizations have been engaged by telephone prior to the field visit in May 2020.	<p>The organizations have confirmed that there are no impacts on the local fishermen due to the construction work and that most commercial fishing is taking place in the lake, not in the section of the Black Sea near the Vadu shore.</p> <p>No grievances have been filled by fishermen or fishermen organization.</p>	<p>BSOG Communications &amp; CSR Manager</p> <p>CLO</p>

## 5.2. Corporate Social Responsibility (CSR) programme

BSOG have designed and started implementation of its Corporate Social Responsibility (CSR) programme based on the Company's CSR policy (See Appendix D). The BSOG CSR programme aims at developing positive community relations and create a social partnership with the representatives of the local community impacted by the Project. 2020 pandemic required adapting the CSR activities. However, BSOG has succeeded the implementation of several CSR activities in Corbu and Vadu.

The following community development actions have been performed in 2020:

- Advocating for improved measures to protect Vadu beach
- Support to Vadu school in implementing BSOG grant
- Improving access to online education for all pupils in Vadu kindergarten and school in the context of COVID 19 Pandemic
- Preserving local traditions and history by supporting the creation of Corbu 1st monography
- Christmas gifts to Vadu school pupils

The above activities are described in the CSR activities Report for 2020, in Appendix E.

## 5.3 Other engagement activities

Besides the above, the following engagement activities have also been performed:

### Engagement with key stakeholders



On 17<sup>th</sup> September 2020, a formal ceremony for the commencement of works for offshore pipeline laying was organized by BSOG together with its main contractor, GSP. The ceremony was attended by several high officials including the Prime Minister, US Ambassador, the Minister of Economy, Minister of Environment and representatives of Transgaz, EBRD, National Agency for Mineral Resources, National Agency for Energy Regulations, Corbu Municipality, ACROPO, EBRD, EPA Constanta, Romanian Naval

Authority, DDBRA, etc. The event was circulated in different national and international online and printed newspapers and on the most popular news channels in Romania.

### Media coverage and press releases

BSOG has also prepared press releases and media announcements, especially when a project milestone is achieved and whenever a public was organised; Information on MGD Project progress have been published in national newspapers such as: Ziarul Financiar, Bursa, G4media, Capital, Profit.ro, Romanian Business Journal, Adevarul, Agerpres, etc.

BSOG is also making use of social media in order to be able to provide meaningful and timely information to any interested party (approximately 1 update/month). For further information you can access the LinkedIn profile, or YouTube channel.

Details regarding the social media coverage and press releases are included in Appendix F.

### Internal communication and engagement activities

Internal communication is done by using several channels: emails, newsletters (once at every 2 months), staff meetings (once at every 3 months or whenever necessary) and intranet platform. The objectives of the staff meetings are to present the MGD project progress, the business development plans, staff logistics going forward, team targets, COVID updates related to working conditions, etc. During the lockdown, these meeting were organized once per month.

To reach out to internal stakeholders, BSOG has developed an intranet platform where employees of BSOG and collaborators that receive access can visualize important documents and receive information on project development. Also, the intranet platform has an online feedback mechanism. Please see Appendix G.

With respect to the CSR mechanism, the employees are informed of the actions perform by the Company either directly via regular meetings, either via e-mail. Appendix H presents the internal announcements for CSR actions performed in 2020.

## 6 STAKEHOLDER ENGAGEMENT PLAN

### 6.1 Action Plan

The following action plan has been designed for 2021 and is presented in Table 7. This plan corresponds to the construction phase of the project, which is set to end by the end of the year.

The objective of these external communications is to provide continuous engagement with targeted audiences to inform about the activities, performance, development and investment plans and their implementation. The exact dates and venues of the proposed activities will be communicated with the stakeholders prior to, during construction and operation phases. The tables below include detailed information on engagement actions to be performed by BSOG during the construction period and a set of generic actions that will be performed during operation period. This plan will be updated at least once per year or according to the project needs and the achieved results.

**Table 5 Stakeholder Engagement Action Plan for 2021**

STAKEHOLDER	ENGAGEMENT METHOD	PURPOSE OF ENGAGEMENT	INFORMATION DISCLOSED/ COLLECTED	LOCATION/ ESTIMATED TIMELINE	RESPONSIBILITY
Local communities of Corbu and Vadu	CSR programme	Social licensing of the project	BSOG will continue to implement the CSR programme and will intensify their community engagement	Corbu and Vadu – yearly programme	BSOG Communications & CSR Manager  CLO



			during this year. The previous experience with working with a local NGO proved to be mutually beneficial.		
	Community Liaison Officer	To address the concerns and expectations of the community  To provide information and consult interested parties  Facilitate community meetings, events etc.	Provide information about the project's impacts and mitigation measures	Corbu and Vadu  Ongoing	BSOG Communications & CSR Manager
Owners of the restaurants located on or near the beach	Direct meetings	Address their concerns and expectations (if any)	Follow up to the claims that have surfaced in the LRR about potential impacts due to the HDD works	Vadu village  Q2 2021	BSOG Communications & CSR Manager
Landowners adjacent to access roads	Direct meetings	Address their concerns and expectations (if any)	Engage owners if impacts have been identified	Vadu village  Q2 2021	BSOG Communications & CSR Manager  CLO
Contractors	Direct meetings  Reporting	Ensure that project is correctly and timely implemented	Provide required information Regular updating meetings with main contractor  Site visits for observing the progress and for monitoring purposes (based on monitoring plan and internal audit requirements)  Discuss the monthly progress reports	Construction site – during construction	BSOG: Technical department  Project manager
Transgaz	Direct meetings (when needed)  Official correspondence  Reporting	Ensure that project is correctly and timely implemented	Regular meetings (quarterly) – project progress  Redirecting received grievances	BSOG Office, Transgaz Office, On site  Ongoing – during project construction	BSOG: Technical department
IFIs	Reporting  Direct meetings (when needed)	Reporting  Direct meetings (when needed)	Project Progress Reports  Monitoring	BSOG office IFI office  Ongoing	BSOG: Financial manager - Daniela Gătin — reporting

			meetings		CEO - Mark Beacom - Direct meetings
Mass media	Press releases and social media coverage	Offering timely information	Provide information about: - the project development - imposed restrictions - official mass media articles / answers to official request for public information - development of information movie (bilingual) on project construction steps – onshore/offshore – publish the movie on website/social media (linkedin/ youtube)	Local/ Regional newspapers that are accessible to residents of affected communities/when necessary  Social media  Ongoing	BSOG: Communications & CSR Manager

During the operations period, BSOG will implement a Stakeholders Engagement Plan, based on the feedback and strategy established for such phase. A detailed timeline for the engagement activities during operation period will be developed 3 months prior to starting the operation.

**Table 6 Stakeholder engagement action plan – generic actions during operation period**

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities <sup>3</sup>
All	Website	To provide access to information in a timely and efficient manner	Project operation reports	BSOG website / EBRD website	BSOG Communications & CSR Manager
	Press releases and social media coverage			BSOG office / national and local newspapers	
	Meeting	Lauching event for GTP operation	Technical description of GTP and offshore infrastructure	GTP Vadu	BSOG Communications & CSR Manager
IFIs	Reporting  Direct meetings (when needed)	Ensure that information is provided on a timely and efficient manner	Project Progress Reports Monitoring meetings	BSOG office IFI office	BSOG: CFO
Local communities of Corbu and Vadu	CSR programme	Social licensing of the project	BSPG will continue to implement the CSR programme during operation period.	Corbu and Vadu – yearly programme	BSOG Communications & CSR Manager

<sup>3</sup> Further information on the responsible person from BSOG is presented in the contact sheet attached to present document

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location and period of disclosure	Responsibilities <sup>3</sup>
National / Local Authorities	Direct meeting	Inspections /Permitting	Information related to operation	BSOG offices / both in Bucharest and Vadu GTP	BSOG: CFO
Children and students	Study visit	Information on GTP operation / research, educational purposes	Technical information on GTP operation and offshore operation	GTP	BSOG Communications & CSR Manager

### CSR activities foreseen in 2021

In 2021, BSOG will continue implementing CSR activities within the local community. The Company is currently developing the CSR Strategy for year 2021. The main focus areas of the strategy will go in the same directions as in the previous years: education, environment and community development.

## 6.2 Record keeping

The project related activities that will require stakeholder engagement processes may help to identify a range of issues that are directly associated with the project or with more strategic issues. Each individual issue raised needs to be considered and addressed by BSOG and, where appropriate, individual responses compiled, and further meetings arranged. All environmental or social concerns raised by stakeholders specific to the MGD Project should be taken forward for consideration in the decision-making processes.

To help manage this, all responses received will be documented in a register and appropriate actions identified and tracked. The register will be maintained and updated as appropriate throughout the project. Minutes will also be produced from all consultation meetings and documented within the consultation register.

## 7 GRIEVANCE MECHANISM

The current grievance mechanism is referring only to external stakeholders and workers contracted by BSOG. The detailed grievance mechanism for external stakeholders is included BSOG internal procedure BSOG-GV-PRO-001-D02. A dedicated grievance procedure for internal stakeholder is included in HR Handbook available for BSOG staff.

Stakeholders have the right to be informed about the project development and implementation and they also have the right to raise concerns and suggestions during the decision-making process. Effective and timely response to grievances is essential for maintaining good community relations, and this includes potential issues related to the project and its associated impacts.

Any request, objection, complaints or proposal filed by any stakeholder related with the project will be classed as a grievance. The stakeholders have the possibility to file anonymous grievances, which will be taken into account and resolved following the same basic steps as with non-anonymous grievances, with the mention that in this case the stakeholder will not receive a formal answer to its complaint. The anonymous grievances have to be recorded in the grievance register as any other regular grievance.

A stakeholder may raise a grievance related to any BSOG operation during the development and commissioning of the MGD project. Also, a stakeholder may also raise a grievance related to projects developed by other parties in proximity of the BSOG operational areas or other facilities that are considered as associated with BSOG operational areas. All these grievances will be recorded within BSOG grievance register and re-directed towards the other project developers. BSOG will provide written answer to the known persons who filed in such grievances informing that their grievance was redirected towards another project developer (offering also the contact details of the person/institution where the grievance was redirected).

The objectives of the BSOG grievance mechanism are to ensure that all grievances are promptly and effectively addressed, in a fair and transparent manner, throughout the Project lifetime. All complaints will

be investigated to establish their validity and to ensure that all accepted grievances are dealt with in a correct and prompt manner; where relevant, corrective actions will be implemented to prevent any recurrence of problems.

The grievance mechanism will be available at the level of BSOG and will include but not be limited to: a template (record form) for logging complaints and suggestions; a direct phone line made available for anybody interested in communicating about the project; an appropriate access via emails and direct meetings with responsible project persons before, during and after construction works; and an online complaint form.

The following elements are included in the external grievance mechanism for the current project:

- A simplified grievance template that was available in 6 locations (one at the mayor's office, one at Agigea Shipyard, one at the Gas Treatment Plant in Vadu, one at Corbu Cultural Center, one at Vadu Cultural Centre and two at the HDD site). The grievance template is also made available in Turkish language for the workers of the main contractor. BSOG collects the lodged grievances once per week. Appendix A includes the Romanian language official template.
- A direct phone number and email address from BSOG community liaison officer was made available to all interested parties for enabling them to contact BSOG's representatives whenever necessary (please also see Appendix B BSOG Contact List).
- Direct meetings with representatives of local communities where they could raise their complaints and/or suggestions, verbal complains.
- An online complaint form that can be easily filled in by any interested party is posted on BSOG's website: <https://www.blackseaog.com/make-a-complaint/>
- Public statements: where statements made in the public domain (e.g. in the press, on television, on social media etc.) are considered to be grievances these are recorded and documented by the BSOG's Communication & CSR Manager for further processing per this procedure.

A complaint is considered to be valid if it is submitted using one of the above-mentioned channels. All valid complaints received during the project ESIA disclosure and implementation process will be processed and registered by CO in a dedicated grievance log. BSOG should keep these grievance registries in order to track all grievances and to be able to present these registries upon any request from EBRD or other relevant entity. The period of time for registry keeping and the methods for archiving documents should be established by internal procedures.

The central log includes the following information:

- Date lodged by complainant or date received by CO;
- Contact details of complainant;
- General information
- Actions to be undertaken;
- Due date;
- Decision;
- Feedback from the complainant;
- Results; and
- Closing date of the issue.
- Close out form signed off by the complainant will be obtained and registered into the system.

The BSOG Grievance Committee is responsible to review all aspects of each grievance and reach a decision on the next step. Where the committee does not reach a decision the BSOG CEO shall be responsible to determine the next steps which amongst others may involve additional experts/personnel being added to the BSOG Grievance Committee for a further review or may involve the BSOG CEO determining the decision to be implemented. BSOG will make all reasonable efforts to address the complaint upon acknowledgement of the grievance, progress chasing with the responsible person/department if actions are overdue and escalating any major problems to senior management. **All grievances will be acknowledged within 7 days and responded to no later than 30 days.** Once a grievance is logged, the related E&S event(s) that caused the grievance will be tracked to ensure proper closed-out of the grievance and prevent similar grievances.

If the complainant is not satisfied with the solutions proposed/implemented by the CO to address the grievance, he/she may seek other legal remedies in accordance with the legal framework of Romania.

All stakeholders will be able to deliver complaints personally by post, e-mail, web site or facsimile. Any complaint may be delivered to the company at:

Black Sea Oil & Gas main office

Bucharest

Calea Floreasca nr. 175, etaj 10

Sector 1, 014459

Bucharest, Romania

Phone: +40 21 231 32 56

Contact person: Ana-Maria Pericleanu/Daniela Stroe

Web site: <http://www.blackseaog.com/en/home/>. Email: [grievance@blackseaog.com](mailto:grievance@blackseaog.com)

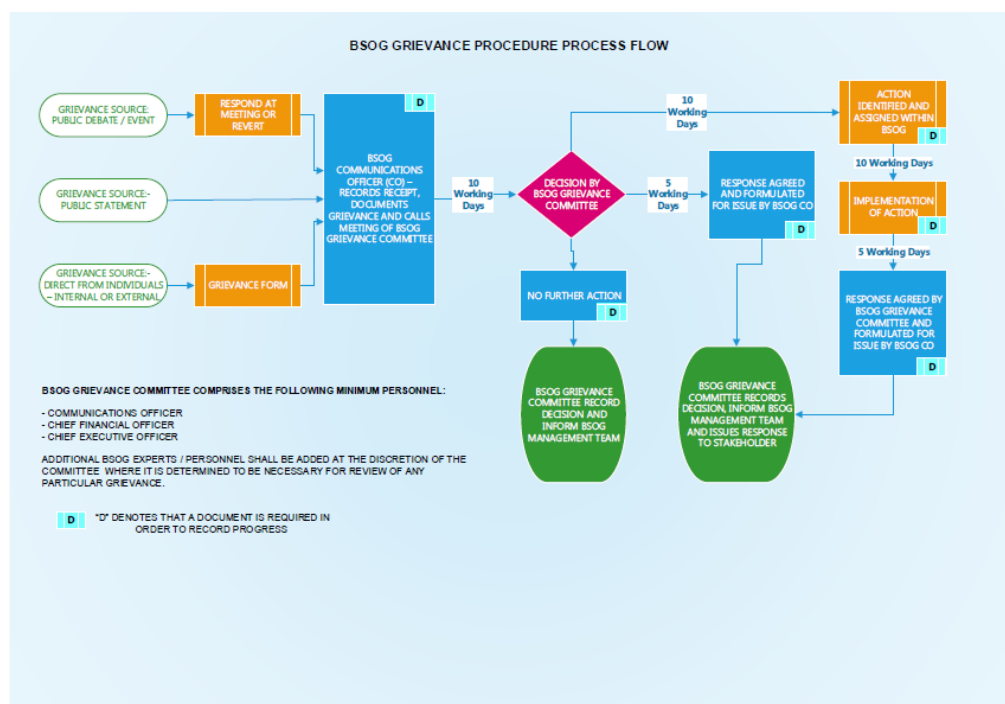
Community Liaison Officer: Elena Cretu

Corbu Commune

Phone number: 0790 69 08 57

E-mail: [elena.cretu@blackseaog.com](mailto:elena.cretu@blackseaog.com).

Figure 7 Overview of Grievance Mechanism





In 2020, BSOG has received and registered 18 complaints/requests for information. These are mostly (14) grievances referring to the delay of receiving the salaries for the work performed during the offshore operations for the MGD Project. BSOG has addressed these grievances in writing with the contractor, has conducted an audit with relevant parties to better understand the difficulties in paying the salaries to employees on time and has performed weekly follow ups by phone with the Contractor on the topic of salaries. In the end, all complainants confirmed the receipt of the salaries and the favourable resolution of the grievances raised.

With respect to the works carried out on Vadu beach during summertime, it has to be mentioned that no grievances have been received by BSOG from tourists and/or owner of the restaurant located in the proximity of the construction site.

The grievances received in the last year are presented in the below table:

**Table 7 Grievances received in 2020**

Date	Stakeholder	Subject of complain	Communication channel	Steps and Resolution
14.02.2020	Member from Corbu Community	Information request - Concern about the impacts of the GTP on environment and life, in general	Grievance box - Letter	1) Grievance review by the Grievance Committee 2) Preparing and sending the answer together with the package of documents describing the impacts of the project on the local community and environment
07.08.2020 25.08.2020	Member from Corbu Community	Jobs request	Grievance box - Letter	1) Grievance review by the Grievance Committee 2) BSOG has discussed with the complainant about the employing procedure 3) BSOG has provided the contact details of the contractor to the complainant
02.09.2020	GTP neighbour	Restore the private road impacted by the works	Grievance box - Letter	1) Grievance review by the has Grievance Committee 2) After internal review it have been concluded that the road was impacted by the works at Transgaz pipeline
15.07.2020 05.08.2020 18.08.2020 09.09.2020 25.09.2020 03.11.2020 05.11.2020 17.11.2020 19.11.2020 24.11.2020 26.11.2020 03.12.2020 28.12.2020 31.12.2020	GSP employees	Delay in payment of salaries	Email – Phone - Letter	1) Grievance review by the Grievance Committee 2) BSOG has carried out discussions via email/telephone with the complainer and liaised with the contractor to solve this issue 3) BSOG has performed weekly phone follow ups with the contractor on the topic of salaries

**Figure 8 Grievance box for tourists, near the HDD site at Vadu beach**



## 8 MONITORING AND EVALUATION

The objective of the monitoring and evaluation process is the continuous improvement of the environmental and social performance of the company.

Subsequent to signing the financing contract, BSOG has to comply with the environmental and social provisions included in the financing agreements, to monitor the project's performance and to provide periodic environmental and social reports to the EBRD. In 2020, BSOG has prepared two Reports for EBRD. The last report was prepared for the period July – December 2020 BSOG will also have the responsibility to facilitate any monitoring visit or audit requested by EBRD.

Monitoring activities will be commensurate with the environmental and social impacts and issues associated with the project. They may also reflect any significant stakeholder concerns and include an environmental and social project completion review or audit, where relevant.

In the monitoring and evaluation process for stakeholder engagement, all the consultations undertaken, all the issues raised, and the actions taken will be recorded. Also, this process implies the description of the lessons learned and any changes to the consultation process.

All queries in relation to the project will be filed in the comments registry, analysed and reported by BSOG project implementation team to management team on a two-month basis during project development and implementation.

The results and feedback from information disclosure and public consultation will be documented and reported as appropriate. Summary reports – in both English and Romanian - will contain details about suggestions or concerns raised by stakeholders and how their comments have been considered.

BSOG Grievance Committee will constantly monitor the engagement level of their stakeholders by developing a set of indicators which will include at least the following items:

- Number of communications;

- Type of communications;
- Frequency of communications;
- Number of valid complaints (and number rejected as unclear, problematic or dubious);
- Type of complaints;
- Sources of complaints;
- Number of resolved complaints;
- Average time for resolution of complaints;
- Number of presentations on environmental, social and economic status of the company;
- Number of mass media articles and / or announcements;
- Number of stakeholders involved per action;
- Level / degree of involvement for each stakeholder;
- Number of visitors on the websites; and
- Number of requests for information via websites.

A clear record of all these indicators will be kept at BSOG Communications & CSR department. Where possible the indicators shall be differentiated by gender and type of stakeholder, according to the categories defined in the Stakeholder Analysis chapter. Gender based data collection will be considered for the green marked indicators from the above list.

Another important aspect is the manner in which the public is informed about the SEP. BSOG Communications & CSR Department will make publicly available the SEP on its website. Also, the SEP will be part of the annual environment and safety report of BSOG.

## 9 REPORTING

### 9.1 Internal Reporting

A review of stakeholder engagement will be presented on a regular basis within the BSOG project team, including:

- Annual CSR report;
- Monthly EHSQ project progress reports;
- Annual EHSQ report (including ISO 14000 provisions).

### 9.2 External Reporting

External reporting will include timely updates to relevant stakeholders regarding Project advancement. The main responsibilities for reporting are attributed to the Communication and CSR Manager. The following activities shall be undertaken as part of the external reporting process:

- Public disclosure of the SEP;
- Environmental reporting to national and local authorities including:
  - Annual and quarterly reports on project development for the National Agency for Mineral Resources;
  - Annual report on number of offshore operation hours for ACROPO.
- Annual E&S report for IFIs;
- Mass media reports including:
  - Public announcements regarding the beginning of the construction, the implementation of certain activities, restrictions and the ceasing of certain

- activities;
- Press releases;
- Social media updates

## 10 ROLES AND RESPONSIBILITIES

The main departments within BSOG responsible for implementing this Stakeholder Engagement Plan are Communication & CSR and Regulatory & PGA. Moreover, starting with April the 1<sup>st</sup>, BSOG will have a Community Liaison Officer within the local community. Some of these roles and responsibilities might change over time to reflect the changing needs of the stakeholder engagement process.

### Communication and CSR Manager responsibilities:

- **Overall SEP implementation:** monitoring and reporting;
- **Website:** Provide access to relevant information about the project;
- **Public consultations:** organize public consultations with the local community in order to provide information and consult interested parties regarding the project;
- **Focus group meetings:** organize focus groups in order to understand the community needs and identify the needs of vulnerable groups;
- **Mass media coverage/ Press releases/ Information disclosure:** offer relevant information to the mass media and third parties;
- **Grievance mechanism:**
  - Grievances received or identified, including filling out case details (General Information, Reported Party and Incident or claim Description/consequences sections) in the Grievance Analysis Report form (format included in Attachment 2) in readiness for the BSOG Grievance Committee meeting;
  - Maintain central log of all grievances ensuring it is kept up to date with current status;
  - Act as member of the BSOG Grievance Committee;
  - Prepare minutes of BSOG Grievance Committee Meetings, formally recording all decisions made by completing the Analysis, Analysis Results and Decision sections in the Grievance Analysis Report form for the case;
  - Prepare responses to grievance raisers and agree content with other members of the BSOG Grievance Committee;
  - Issue all responses to grievance raisers and ensure BSOG Management Team are informed.

### Regulatory and PGA manager responsibilities:

- **Public debates:** organize public debates related to the permitting processes and project compliance;
- **Meetings with local authorities and official correspondence:** organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;
- **Meetings with national authorities and official correspondence:** organize meetings and correspondence in order to offer information about the project, request feedback, identify concerns and obtain permits;

### Community Liaison Officer responsibilities:

- **Grievance mechanism:**
  - represent community concerns and grievances to the company;
  - report the concerns and grievances to the company fairly and consistently;
  - deliver back the resolution to the issues raised;
- **Community engagement:**
  - build relationships based on trust and mutual respect;

- secure and maintain broad and long-term community support for the company's activities.

Further details on responsibilities and specific tasks associated with the above-indicated roles as well as the lines of responsibility within the overall project organization are provided in the Environmental and Social Management Plan (ESMP) and in the Job descriptions. The ESMP defines the overall environmental and social management planning for the entire project.



## APPENDIX A Grievance Form

Nr:		
Data:		

FORMULAR DE OBSERVAȚII ȘI SUGESTII	
<b>Nume complet:</b> Acest formular poate fi depus anonim, caz în care vă rugăm să reveniți pentru răspuns în 30 de zile de la depunere	
<b>Informații de contact</b>  (vă rugăm să completați cum doriți să fiți contactat/ă):	<b>Prin poștă: Adresa poștală:</b> _____ _____ <b>Telefon:</b> _____ <b>E-mail:</b> _____
<b>Vă rugăm să notați aici sugestiile și observațiile dvs. privind Proiectul MGD:</b>	

Semnătura: \_\_\_\_\_

Data: \_\_\_\_\_

Acest formular poate fi depus:

- direct în cutia de reclamații și sugestii a BSOG plasată în orice sediu al BSOG sau al contractorului principal sau la sediul Primăriei Comunei Corbu, Str. Principala nr. 38, județul Constanța,
- prin poștă în atenția dnei Ana-Maria Pericleanu, Communications & CSR Manager, Tel.: +40 (0) 724 254 909, adresa Calea Floreasca, nr. 175, et. 10, Sector 1, Bucharest, sau E-Mail: grievance@blackseaog.com

Cererea dvs. va fi înregistrată și vă vom răspunde în termen de maximum 30 de zile.

Black Sea Oil & Gas SRL – Politică de confidențialitate a datelor cu caracter personal

Această Politică de confidențialitate vă informează cum Black Sea Oil & Gas SRL și afiliații sau partenerii săi („BSOG” sau „noi”) colectăm, distribuim și folosim informațiile dvs. personale în legătură cu completarea unei sugestii sau reclamații legate de activitățile BSOG.

Respectăm confidențialitatea dvs. și ne angajăm să colectăm, să menținem și să utilizăm informații personale despre dvs. în mod responsabil și în conformitate cu această politică de confidențialitate a datelor cu caracter personal.

## Colectarea și utilizarea informațiilor personale

Colectăm informații personale care vă identifică:

- Nume complet
- Email
- Număr de telefon
- Adresa de corespondență

BSOG are un interes legitim pentru a utiliza informațiile personale pe care le colectează pentru:

(i) a ține o evidență; și

(ii) asigura comunicarea cu persoana care a depus sugestia/plângerea pentru a primi soluționarea acesteia.

## Perioada de retenție

BSOG va păstra informațiile dvs. personale atâta timp cât este necesar în scopurile prezentate în această politică de confidențialitate, precum și pentru a respecta obligațiile noastre legale;

La sfârșitul perioadei de păstrare, BSOG va șterge informațiile dvs. personale într-un mod în care acestea nu pot fi reconstruite sau citite.

## Angajamentul nostru pentru securitate

Folosim tehnici de stocare și securitate a datelor actualizate pentru a vă proteja informațiile personale împotriva accesului neautorizat, a utilizării sau dezvăluirii necorespunzătoare, a modificărilor neautorizate sau a distrugerii ilegale ori a pierderii accidentale. Toți angajații noștri sunt obligați să respecte confidențialitatea informațiilor dvs.

## Drepturile dumneavoastră

În legătură cu informațiile personale pe care le prelucrăm, aveți următoarele drepturi:

- dreptul de a fi informat cu privire la modul în care informațiile dvs. personale sunt procesate de BSOG;
- dreptul de acces la informațiile dvs. personale;
- dreptul de a rectifica informațiile dvs. personale dacă sunt inexacte sau incomplete;
- dreptul de a șterge (elimina sau șterge) informațiile dvs. personale atunci când acestea nu mai sunt necesare în raport cu scopul pentru care au fost prelucrate inițial;
- dreptul de a restricționa procesarea dacă considerați că interesul legitim al BSOG a depășit drepturile dvs. sau informațiile dvs. personale sunt ilegal procesate;
- dreptul la portabilitatea datelor care vă permite să mutați, să copiați sau să transferați date cu caracter personal din BSOG către orice altă persoană indicată de dvs.

## Informații de contact

Dacă doriți:

- să accesați informații personale referitoare la dvs;
- să solicitați corectarea sau ștergerea informațiilor dvs. personale;
- să vă opuneți prelucrării sau să solicitați o restricție privind utilizarea informațiilor dvs. personale;
- pentru a ridica orice altă preocupare cu privire la utilizarea informațiilor dvs. personale;
- atunci vă rugăm să ne contactați folosind formularul nostru de contact și vom lua măsuri rezonabile pentru a rezolva aceste probleme cât mai curând posibil.

## Controlor de date

Controlorul de date este: Black Sea Oil & Gas SRL

Dacă aveți întrebări în legătură cu această politică, vă rugăm să ne contactați la adresa:

Calea Floreasca, nr 175, etaj 10, Sector 1, București, România;

Telefon: +40 21 231 3256

Fax: +40 21 231 3312

Email: [dpo@blackseaog.com](mailto:dpo@blackseaog.com)

## APPENDIX B

## BSOG CONTACT LIST

<p>Overall SEP implementation Grievance Mechanism Mass media coverage Public Consultations</p>	<p>Ana-Maria Pericleanu Communications &amp; CSR Manager</p> <p>Black Sea Oil &amp; Gas SA 175 Calea Floreasca St. 10th floor District 1, Bucharest T: +40 212 313 256   F: +40 212 313 312   M: +40 724 254 909 Ana-Maria.Pericleanu@blackseaog.com</p> <p>www.blackseaog.com</p> <p>Elena Cretu Community Liaison Officer</p> <p>Corbu village Phone number: 0790 69 08 57 E-mail: <a href="mailto:elena.cretu@blackseaog.com">elena.cretu@blackseaog.com</a>.</p> <p>Daniela Stroe - Grievance Mechanism HR Manager</p> <p>Black Sea Oil &amp; Gas SA 175 Calea Floreasca St. 10th floor District 1, Bucharest, 014459, RO T: +40 212 313 256   F: +40 212 313 312   M: +40 731 199 444 Daniela.Stroe@blackseaog.com</p>
<p>IFIs Contractors</p>	<p>Mark Beacom CEO</p> <p>Black Sea Oil &amp; Gas SA 175 Calea Floreasca St. 10th floor District 1, Bucharest T: +40 212 313 256   F: +40 212 313 312   M: +40 729 199 316</p> <p>Mark.Beacom@blackseaog.com www.blackseaog.com</p> <p>Daniela Gătin Financial manager — Reporting</p>
<p>Regulatory / Permitting aspects Public debates</p>	<p>Oana Ijdelea Email: Oana.Ijdelea@blackseaog.com</p>

## APPENDIX C Engagement actions performed between 2017 – 2019 – extract from Stakeholder Engagement Reports

The below table highlights the main aspects of our company has focused in 2017, 2018 and 2019 in terms of engagement with specific stakeholders and public at large:

Stakeholder	Engagement method	Actions performed in 2017	Actions performed in 2018	Actions performed in 2019
All	Website	<p>The BSOG website is available to all stakeholders, both in Romanian language and English.</p> <p>The website provides general and specific information about the project development such as: information on SEA / EIA processes, public announcements, invitations to public debates, decisions of environmental authorities, environmental reports for project components, etc.</p> <p>Beside its website, BSOG is also using social media (LinkedIn) for disseminating information about its activity.</p> <p>Based on the official statistics, the total number of visitors on the BSOG website was at about 18,456 users. Out of these, about 32% have been from Romania. Most of the users are accessing the news section of the website.</p> <p>The website does not include a grievance template (currently under preparation) but the company receives about 5 emails per month that are requesting information or provides suggestions for the company.</p> <p>Beside the official webpage that is available for public at large, BSOG has also developed an internal page that can be accessed only by the shareholders and employees of BSOG. On this</p>	<p>Via its website, the company constantly provides information to all interested stakeholders about the project's development and makes public announcements about key stakeholders' decisions, public consultation processes, and decisions related to permitting process; To reach out to internal stakeholders, BSOG has developed an intranet platform where employees of BSOG and collaborators that receive access can visualize important documents and receive information on project development. Also, the intranet platform has an online feedback mechanism.</p> <p>The website contains a link for submitting grievances that can be easily filled in by any interested party is: <a href="https://www.blackseaog.com/make-a-complaint/">https://www.blackseaog.com/make-a-complaint/</a></p>	<p>The website and social media pages of BSOG have continued to provide the same functionalities as in 2018.</p>

Stakeholder	Engagement method	Actions performed in 2017	Actions performed in 2018	Actions performed in 2019
		dedicated webpage there are information available about all the activities of BSOG.		
	Visual materials for educational purposes	-	BSOG edited two videos about specific project activities in the offshore industry to educate the public on offshore industry dynamics, get understanding and support for its activities and endeavours. One video presents an offshore exploration drilling campaign from BSOG drilling campaign in 2018, the other is a 3D animation of the MGD Project.	
	Public consultations	<p>Information about the public consultations have been provided via BSOG website throughout the entire year and through posting of announcements on the information board of the local authority and on site, as the case may be, based on the steps of the permitting process. The website includes announcements about the public debates and the decisions issued by the national /local environmental protection agencies.</p> <p>During 2017, BSOG together with the representatives of national and local authorities have organised/participated at the following public debates:</p> <ul style="list-style-type: none"> <li>- 1 public debate for consulting on the preparation of the urban planning document for the GTP</li> <li>- 1 public debate for consulting on the strategic environmental assessment process for the GTP</li> <li>- 1 public debate for consulting on the environmental impact assessment process for the GTP</li> </ul>	<p>In 2018, 4 public consultations were organized in during the permitting processes:</p> <ul style="list-style-type: none"> <li>- 1 consultation on the environmental impact assessment process and report for MGD-onshore component (14.01.2019)</li> <li>- 1 consultation on the preparation of the urban planning document for the beach segment of the onshore pipeline (20.04.2018)</li> <li>- 1. consultation on the environmental impact assessment process and report for Madalina-1 exploration well</li> <li>- 1. consultation on the environmental impact assessment process and report for MGD-offshore component (17.12.2018)</li> </ul> <p>One written enquiry was received from an NGO in Constanta on 30<sup>th</sup> January 2018 in relation to the Environmental Impact Assessment Report for the GTP. The NGO (Dominocost)</p>	<p>On June 12th, 2019 a public consultation has been organized in Vadu had to inform the community members on the MGD Project impacts and works calendar in the area, once the construction works will start.</p> <p>BSOG sent out by email on June 14th, 2019, all ESIA documents issued in relation to the MGD project to a list of NGOs active in the environmental protection sector, as advised by its public relations consultants and asked to review the documentation and send comments or ask for additional information.</p> <p>As part of the engagement with local NGOs from Corbu and Vadu, a request has been made from Bankwatch in July 2019, for them to be involved in the consultation process and have formulated 10 questions regarding the MGD Project. At the time of this report, the engagement with Bankwatch has remained a virtual one, communication</p>



Stakeholder	Engagement method	Actions performed in 2017	Actions performed in 2018	Actions performed in 2019
		<p>- 1 meeting for the obtaining of the consent of the National Committee of the Coastal Area for the urban planning document for the GTP</p> <p>No questions or remarks regarding the documentation were received by BSOG during the period of time allocated for questions or comments.</p>	<p>challenged a statement in the EIA regarding the overall positive climate change project impact (as result of displacement of more greenhouse gas emission-intensive fuels) suggesting it is irrelevant as the assessment is to be focused on the air emission impacts on nearby project areas including Vadu Village. Furthermore, the NGO raised the fact that an urban zoning plan indicating the intention for a potential future construction of a touristic facility on land parcels within less than 150 m from the GTP has been approved. The NGO questioned whether the project and the potential future development may be in conflict e.g. as result of establishing a sanitary protection zone around the GTP that would prevent the future touristic development. Although the enquiry was raised after the formal disclosure and public consultation period of 30 days elapsed, in February 2018 BSOG replied in written form providing adequate response to the issues raised by the NGO. The answer provided guidance to the relevant sections in the EIA addressing the issues raised and demonstrating that all project impacts, including the air emissions were assessed, are within acceptable levels and aligned with the regulatory requirements. Also, the answer indicated that the applicable safety zone would not exceed 30 m from the project equipment and, given the location of the project facilities within the GTP site, this safety distance does not extend beyond the fenced site boundaries. Hence the</p>	<p>being performed through email, as detailed in the Grievance section of the document</p> <p>As part of the CSR programme, 2 sessions of community consultations have been organized in Corbu with the aim to validate with local key stakeholders the CSR directions and engage community in solving local needs. Organized on 12th July and 28th August 2019, the meetings gathered 16 members from the local community -representatives of the City Hall, teachers, priests, owners of local business, NGOs representatives, regular citizens. The community meetings conclusions were used to better draft the next stages of the CSR strategy and better tailor future programs to the needs of the community.</p>

Stakeholder	Engagement method	Actions performed in 2017	Actions performed in 2018	Actions performed in 2019
			potential future development of the indicated touristic facility or of other developments is not prevented in any manner.	
Local/ Regional/ National Authorities	Meetings	Several meetings have been held with different local/regional authorities in Constanta and Tulcea Counties. Among these, the most important stakeholders engaged during 2017 were:	<p>BSOG has organized and participated various meetings with representatives of the authorities in order to explain and present the project. As an example, the BSOG representatives have participated at a meeting organized in Corbu with the members of Local Council where they have discussed and presented the project progress.</p> <p>BSOG has fully participated in the various permitting procedures for the components of the project. These correspondences are ongoing and shall expand to cover elements of the entire project. On-going relevant engagement with a large number of authorities will continue throughout the life of the project.</p> <p>Local and national NGOs were invited to each public debate meeting organized during the environmental permitting process, however, with a single exception (Dominocost which attended the GTP public debate in December 2017), no one else showed their interest in attending the debates.</p>	During 2019, BSOG representatives have participated in meetings organised by state authorities regarding different specific technical aspects. As example, ACROPO organised consultation meetings with offshore operators, regarding issuance of a Stand-By Vessel Guideline. Another meeting organised by ACROPO had the purpose of presenting their results of reviewing the initial Reports on Major Hazards prepared by offshore operators.
	Official correspondence	<ul style="list-style-type: none"> <li>- Local authority of Corbu commune</li> <li>- Environmental Protection Agency of Constanta</li> <li>- Danube Delta Biosphere Reserve Administration.</li> </ul> <p>Beside the official meetings with representatives of Ministries, the BSOG management team had high level meetings with the Romanian Government, the President of the Senate and representatives of the Chamber of Deputies to discuss about BSOG's activity in the Black Sea region.</p> <p><a href="https://www.linkedin.com/company/10198071/">https://www.linkedin.com/company/10198071/</a></p> <ol style="list-style-type: none"> <li>1. Grindeanu meeting of 19 April</li> <li>2. Ciolacu meeting of 14 November</li> <li>3. Tariceanu meeting of 15 November</li> <li>4. Mihalcescu meeting of 15 November</li> </ol> <p>For the purpose of preparing the ESIA report, the following supplementary meetings have been held:</p> <ul style="list-style-type: none"> <li>- National Agency for Fishing and Aquaculture (ANPA)</li> <li>- Romanian Naval Authority (ANR)</li> </ul>		


Stakeholder	Engagement method	Actions performed in 2017	Actions performed in 2018	Actions performed in 2019
		<p>Official correspondence was initiated with different stakeholders. A stakeholder engagement registry is kept by BSOG where all the official correspondence is registered.</p> <p>Representatives of BSOG have also participated at different working group meetings organised by national authorities for development or improvement of sectoral legislation or specific procedures for oil and gas. BSOG reviewed and provided technical input to several sectoral policies that are currently under preparation.</p>		
	Study visits	-	In July 2018 BSOG has organised a site visit with three authorities (NAMR, EPA and Corbu Mayor House) by helicopter at Paula-1 exploration well during the drilling stage.	
Representatives (and potentially individual members) of the affected local communities / Professional groups (fishermen/local businesses)	Direct meetings and site visits	During the preparation of the ESIA scoping report, BSOG has been in contact with the representatives of local community directly impacted by the project. There were three missions conducted for data collection at the level of local community. During these missions, direct meetings with members of local community have been held and socio-economic data have been collected. The scope of these data collection missions were to understand the socio-economic context of the project development and to capture the concerns and expectations of local community.	Several meetings and site visits were performed for collecting environmental and social data required for the purposes of ESIA and AESIA. During these site visits, the representatives of BSOG and external consultants performed meetings with local authorities, residents of Vadu and Corbu, owners of local businesses, road users, other construction companies active in proximity of the project area, representatives of local NGO, etc. All the persons met considered that the BSOG project will bring benefits to the local community and have no objections or concerns related to the project construction and operation period.	On June 12th, 2019 a public consultation has been organized in Vadu had to inform the community members on the MGD Project impacts and works calendar in the area, once the construction works will start.

Stakeholder	Engagement method	Actions performed in 2017	Actions performed in 2018	Actions performed in 2019
Mass media	Press releases	<p>The project development and the environmental permitting process was reflected in the mass media both at local and national level. BSOG has published 12 public announcements in 2017, either on permitting process or decision on permits issued.</p> <p>Beside these, BSOG activity has also been reflected in 12 mass media articles either at national level or international one.</p> <p>BSOG is constantly monitoring the way they company activity /name is reflected in social media. According to the mass media report for the period October – December 2017, the name BSOG appeared 45 times in social media. (the Social Media Analysis Report is available upon request)</p>	<p>BSOG has also prepared press releases and media announcements, especially when a project milestone is achieved and whenever a public consultation session was organised; Information on MGD project progress have been published in national newspapers such as: <a href="#">Ziarul Financiar</a>, <a href="#">G4media</a>, <a href="#">Capital</a>, <a href="#">Profit.ro</a>, <a href="#">Romanian Business Journal</a>, etc.</p> <p>BSOG is also making use of <b>social media</b> in order to be able to provide meaningful and timely information to any interested party (approximately 1 update/month). For further information you can access the <a href="#">LinkedIn profile</a>, or <a href="#">YouTube channel</a>.</p>	<p>BSOG has also prepared press releases and media announcements, especially when a project milestone is achieved and whenever a public consultation session was organised; Information on MGD project progress have been published in national newspapers such as: <a href="#">Ziarul Financiar</a>, <a href="#">G4media</a>, <a href="#">Capital</a>, <a href="#">Profit.ro</a>, <a href="#">Romanian Business Journal</a>, etc.</p> <p>BSOG is also making use of <b>social media</b> in order to be able to provide meaningful and timely information to any interested party (approximately 1 update/month). For further information you can access the <a href="#">LinkedIn profile</a>, or <a href="#">YouTube channel</a>.</p>
Employees/ shareholders	Internal Official Reports	Prepared for presenting the results of the performance monitoring and evaluation to internal stakeholders and in order to provide meaningful information to all the investors that are supporting BSOG.	Prepared for presenting the results of the performance monitoring and evaluation to internal stakeholders and in order to provide meaningful information to all the investors that are supporting BSOG.	Prepared for presenting the results of the performance monitoring and evaluation to internal stakeholders and in order to provide meaningful information to all the investors that are supporting BSOG.

## Stakeholder Engagement Activities during the Design and Implementation of Corporate Social Responsibility Programme:

BSOG has also designed and started the implementation of its **Corporate Social Responsibility (CSR) programme** based on the Company's CSR policy. The BSOG CSR programme aims at developing positive community relations and create a social partnership with the representatives of the local community impacted by the Project.

**Table 1 CSR activities performed in 2017**

		CSR ACTIONS REGISTER 2017				
No.	Activity Description	Initiator	Collaboration type	Stakeholders targeted	Date/Period	Supplier
1	Centenary commemoration of WW1 - laying wreaths of flowers	Corbu Cultural Centre	sponsorship in kind	entire local community	25 May 2017	FloriConstanta.ro
2	Centenary commemoration of WW1 - lunch for relatives of WW1 veterans	Corbu Cultural Centre	sponsorship in kind	relatives of WW1 veterans	25 May 2017	D'AquaDolce
3	Centenary commemoration of WW1 - trip to the Marasesti mausoleum for the young people of Corbu and Vadu	Corbu Cultural Centre	sponsorship in kind	young people of Corbu and Vadu	02 June 2017	transport: Transeveren
4	Centenary commemoration of WW1 - trip to the Marasesti mausoleum for the young people of Corbu and Vadu	Corbu Cultural Centre	sponsorship in kind	young people of Corbu and Vadu	02 June 2017	lunch at Marasesti
5	Bucharest Student Chapter of AAPG students field trip to Bulgaria in August 2017 (500 EUR)	Societatea Geologica a Romaniei	sponsorship contract	geology students, academic environment	19 June 2017	n/a
6	School start in Vadu: provision of books, pen and chocolate for 41 children enrolled in the 2017-2018 school year	BSOG	sponsorship in kind	School, Mayor's House, children	11 September 2017	Various bookshops
7	Social case of Mrs Jaiba Niculina whose house collapsed, BSOG contributed with building materials to build one room	Corbu Mayor House	sponsorship in kind	Mayor's House, local inhabitants	02 October 2017	Dedeman Constanta
8	Sponsorship of charity concert initiated by ViitorPlus (national environmental and social entrepreneurship NGO) on October 22nd, Music & Forests partner package (1000 EUR)	ViitorPlus	sponsorship contract	National NGO	22 October 2017	n/a
9	National Day celebrations for young people of Corbu and Vadu (prizes for competitions)	Corbu Cultural Centre	sponsorship in kind	young people of Corbu and Vadu	01 December 2017	Emag Bucuresti
10	National Day celebration @ Vadu School (lunch for 56 children following the festivity)	BSOG	sponsorship in kind	Vadu School	01 December 2017	D'AquaDolce
11	Christmas festivities at Vadu school (gifts for 56 children)	BSOG	sponsorship in kind	Vadu School	21 December 2017	Jumbo Constanta

During 2017 several meetings were held with the representatives of Corbu Local Council, a local NGO (Corbu Cultural Centre) and the Corbu School director to understand the community issues and needs. Following the meetings, a CSR programme including 11 actions was implemented in 2017 (refer to Table 3 below). The majority of the actions part of this programme were implemented in cooperation with a local NGO from Corbu. BSOG's contribution was visible at local level as result of the support provided in the organization of different cultural events and due to the support provided to vulnerable persons from the local community.

Other activities supported and/or financed by BSOG in 2018 and 2019 in the community are indicated in table 2 and 3 below.



**Table 2 CSR activities performed in 2018**

BlackSea oil & gas		CSR ACTIONS REGISTER 2018				
No.	Activity Description	Initiator	Collaboration type	Stakeholders targeted	Date/Period	Supplier
1	Bucharest Student Chapter of AAPG students field trip to Ramnicu Valcea in August 2018 (1000 EUR)	Societatea Geologica a Romaniei	sponsorship contract	geology students, academic environment	01 August 2018	n/a
2	IT equipment donation (5 Dell desktops, 5 Dell units, 5 Dell keyboards, 5 Dell mouses)	B SOG	sponsorship in kind	Corbu school	06 September 2018	B SOG
3	Young oak trees planting (100 pc)	Corbu School	sponsorship in kind	Corbu and Vadu community	17 November 2018	Romsilva Agigee
4	National Day celebration @ Corbu School (stationery for Romania's flag)	Corbu School	sponsorship in kind	Vadu School	01 December 2018	Emag, Dedeman
5	4-day camp to Alba Iulia for Corbu and Vadu young people to celebrate the Centenary of Great Romania	Corbu Cultural Centre	sponsorship	young people of Corbu and Vadu	4-8 December 2018	n/a
6	Christmas festivities at Vadu school (gifts for 5 children)	B SOG	sponsorship in kind	Vadu School	18 December 2018	Decathlon, Mega Image, Carrefour

**Table 3 CSR activities performed in 2019**

BlackSea oil & gas		CSR ACTIONS REGISTER 2019			
No.	Activity Description	Collaborator	Stakeholders targeted	Date/Period	
1	Community consultations (2 sessions) - facilitator	Alexandra Tomescu	KOLs, community members	July - August 2019	
1,1	Community consultations (2 sessions) - support services (lunchx2)	various	KOLs, community members	July - August 2019	
2	Assessment report of visitors and tourists impact on Vadu and Corbu beaches, meetings with ARBDD (3 meetings)	Asociatia de Ecoturism din Romania	Tourists, ARBDD	August - November 2019	
3	Mentorship program for Corbu and Vadu school teachers (3 sessions) - trainer	Asociatia Curba de Cultura	teachers	01 November 2019	
3,1	Mentorship program for Corbu and Vadu school teachers - support services (lunchx4)	various	teachers	01 November 2019	
4	Trees planting in Corbu and Vadu - trees (130) and give aways (65)	Romsilva	children, teachers, community members	29 October 2019	
4,1	Trees planting in Corbu and Vadu - support services (lunchx1, photox1)	various	children, teachers, community members	29 October 2019	
5	Vadu Patrol - educational program for environment protection with Vadu school (lunchx1, give awaysx45, photox1)	Oceanic Club	children, teachers, community members	16 November 2019	
6	Dolphinarium Visit with Vadu school (entrance fees, giftsx54, photox1)	Constanta Dolphinarium	children, teachers, B SOG employees	19 December 2019	
7	Consultancy on CSR issues (7 months)	Graffiti PR	n/a	18 December 2018	

The following engagement activities and community development actions have taken place in 2019:

- **Community consultations** - As part of the CSR programme, 2 sessions of community consultations have been organized in Corbu with the aim to validate with local key stakeholders the CSR directions and engage community in solving local needs. Organized on 12th July and 28th August 2019, the meetings gathered 16 members from the local community - representatives of the City Hall, teachers, priests, owners of local business, NGOs representatives, regular

citizens. The community meetings conclusions were used to better draft the next stages of the CSR strategy and better tailor future programs to the needs of the community.

- **Mentorship program for Corbu School teachers** - 12 teachers from Corbu school and NGO representatives actively participated to a 4-half day working sessions, organized to the Cultural Youth Center in Corbu. They learned how to write a project proposal, tips and tricks for successful projects, and they succeeded to finalize the narrative for the 2020 project that will be implemented in Corbu, as well the budget. The project, to be implemented starting with January 2020, aims to reduce aggressivity in school and increase pupil's life skills. More than 170 pupils and 150 parents will benefit from the project activities, such as counselling, summer school, study visits in museums, theatre shows, competitions, movies projections and workshops in school.
- **Tourists and visitors impact report** - The report was elaborated by the Romanian Ecotourism Association (AER) who conducted the diagnosis of the region which concluded the following:
  - even though the beach is part of ABRDD, there is no evidence of management, information, interpretation and control.
  - the municipality is supporting the costs of waste management, collecting the waste bins ones per week, however no income or other benefits are present for the municipality.
  - there is a mixture of arguments provided by various interviewed visitors, why are they there: freedom, wild and unspoiled beach with constructions, back to nature;
  - there is a higher degree of responsibility towards nature for some of the visitors.

In this regard, three meetings were organized in 2019 with DDBRA Governor and the Executive Director which resulted in three actions that will be developed together with DDBRA in 2020:

- BSOG will assist DDBRA in better mapping Vadu beach by sending DDBRA the biodiversity study completed recently for the Horizontal Directional Drilling feasibility study.
- BSOG will explore if any recommendation can be made to identify camping and parking lots on Vadu beach.
- BSOG will start working on a promoting/communication plan to disseminate in 2020 DDBRA measures to protect Vadu beach, based on DDBRA's new Regulation Plan

During the third meeting with the Governor, in November 2019, it was agreed that a partnership agreement should be signed between the 2 institutions as a base for the future joint projects. Before the partnership was officially closed, a new Governor was appointed by the Romanian Government, in the last week of December 2019. In consequence all discussions were postponed for 2020.

- **Tree planting action in Corbu and Vadu** - On October 27th, more than 130 trees were planted in Vadu and Corbu by a joint team of volunteers from the local community and BSOG. A group of 45 teachers, pupils, teenagers from the Youth Center, local volunteers and BSOG staff gathered to the Youth Center in Corbu and the school yard in Vadu to plant oaks and lindens.
- **Vadu Patrol – Ecological education workshop** - In response to the need identified by the citizens in Corbu to act as environment guardians for the beaches, BSOG developed Vadu Patrol – Patrula de la Vadu, a long-term program for environment protection education. The program aims to raise awareness among adults and children in Corbu and Vadu regarding the importance to keep unaltered flora and fauna, a key element for ensuring the sustainability of area. The first action of the program was addressed to pupils (40 children from Vadu primary school and kindergarten, aged 3-11), from Vadu School and brought an innovative educational approach to environment education, combining learning and discovery lessons in classroom and nature. The action was implemented with Oceanic Club Association, a well-respected NGO from Constanta.
- **Dolphinarium visit** - On December 20th, 50 pupils from the kindergarten and primary school in Vadu, took the school bus to Constanta and enjoyed a special day in the Complex.

A **Photo Report** of the meetings performed in 2017-2019 is presented below:

**Picture 1 Public Consultation Meeting – 27th of December 2017**



**Picture 2 Meeting of the National Committee for Coastal Area**



**Picture 3 Meeting with the Prime-Minister of Romania**



**Picture 4 Site tour with local authorities, July 2018**






**Picture 5 Community consultation meeting, July 2019**



**Picture 6 Mentorship program for Corbu School teachers, November 2019**



**APPENDIX D CSR policy**

<p><b>CSR POLICY</b> BSOG-CO-POL-001-D01</p>	
<p>BSOG's CSR policy is rooted in the Company's core values of safety, perseverance, pioneering, team work and accountability and aims to meet the expectations of the Company's stakeholders that BSOG runs its business guided by international standards and best industry practices.</p> <p><u>Employees &amp; people</u></p> <p>BSOG values diversity and seeks to provide all staff with the opportunity for employment, career and personal development on the basis of ability, qualifications and suitability for the work as well as their potential to be developed at the job, while working towards our business objectives.</p> <p>We seek to guarantee that all employees are treated fairly and with dignity and consideration for their goals and aspirations.</p> <p><u>Health &amp; Safety</u></p> <p>We are committed to conducting our operations safely and responsibly, which means supporting local communities and protecting the environment, as well as looking after the health and safety of our employees and contractors hired by BSOG.</p> <p>Our goal is to maintain a zero-accident record and we are continually looking for ways to improve our Health and Safety Management System.</p> <p><u>Community</u></p> <p>We seek to make positive contributions to the local economy by improving and maintaining the wellbeing of the community local to our operations. To this end, we work to establish long-term relationships with the local community, understand its needs and assist the community help itself.</p> <p>Our CSR activities focus on education, community development and environmental protection and are conducted in partnership with local people, NGOs, local authorities and other stakeholders. BSOG is committed to making a positive, sustainable impact in these areas.</p> <p><u>Corporate Governance</u></p> <p>BSOG is committed to ensuring that its daily operations are conducted in all respects according to rigorous ethical, professional and legal standards.</p> <p>To this end, BSOG has put in place a system of procedures that enhances the transparency of its business through the strict compliance with the applicable laws and regulations and has zero tolerance to bribery and corruption.</p> <p><u>Environment</u></p> <p>BSOG recognizes that minimising environmental impact and the prevention of environmental incidents are essential to the operation of our business. We continuously improve our performance by setting and reviewing environmental objectives and targets and monitoring our progress.</p> <p>Our environmental responsibilities are addressed throughout the value chain and we are constantly investing in ways to reduce our carbon footprint and waste as well as to enhance our energy and water efficiency.</p>	
<p><b>Mark Beacom</b> Chief Executive Officer Black Sea Oil &amp; Gas</p>	<p>Signed:</p> <p>Date: 27.02.2019</p>

## APPENDIX E

### CSR activities report 2020

2020 pandemic required adapting the CSR activities planned to be implemented in Corbu. A string of challenges came also with the new context, impacting the development of potential activities:

- Quarantine restricted travel and direct meetings
- Schools closed for more than one semester and all activities involving direct contact were halted. Many regular educational activities could not be any longer implemented.
- As classes moved online, many pupils in Corbu, from poor social backgrounds, could not attend classes as they lacked access to internet or devices (tablets).
- Vadu beach popularity among tourist increased significantly in 2020 and in consequence the no. of tourist and their negative impact on the beach and surrounding wildlife. Even though the no. of tourists reached a never-before-seen peak of 25.000 in a weekend by August, there are still not sustainable measures taken to ensure lower tourism impact in 2021.

Considering the challenging year we have succeed to implement a range of impactful activities for the community, responding in this way to the newly emerged needs pandemic brought:

#### 1. Advocating for improved measures to protect Vadu beach

In 2020 we continued our efforts to connect with relevant stakeholders involved in protecting Vadu beach. The most important action in this direction was to start discussions with one of the main environmental NGOs working for protecting Romanian shores, Mare Nostrum Association. Together with Mare Nostrum we debated the main environmental challenges and solutions for Vadu beach, and we agreed on a string of potential actions that could be implemented in 2021. One of them will be an awareness campaign among tourists and campers on the beach.

We informed ARBDD about our intentions to develop projects aiming to protect Vadu ecosystem and we shared with the new leadership of the institution (appointed in December 2019) our proposals.

Together with our partner, AUDITECO, we assessed and discussed potential awareness measures to be implemented together with local and national authorities to protect wildlife in Corbu. Among them are installing informative boards in various points in the reservation on the road connecting Vadu village with the beach, informing tourists about the ecosystem and warning them about overspeeding impact in the reservation.

Together with Raluca Serban (Auditeco) we followed the road to the beach and draw an imaginary road map of protected species (like turtles). Based on the current ARDD boards distributed on the cars road, we decided to propose ARBBB to place new boards with relevant signs (Attention turtles, Drive carefully, Description of protected species) at various points along the road to the beach. For each of this point Auditeco will present an information board proposal to be discussed with ARBDD and the Corbu Town Hall.



#### 2. Support to Vadu school in implementing BSOG grant

The start of the project UBUNTU, implemented by Corbu school with a 12.000 euro grant from BSOG,



was marked with the beginning of pandemic in 2020. Therefore, we discussed with the project team to adapt the activities though keep in mind the objectives of the project.

The main activities implemented by the school in 2020 included:

- Counselling sessions with pupils and parents
- Online drawing contest for pupils A friendly school
- Movie and theatre viewing on bullying thematic for pupils
- Training for teacher's development.

### 3. Improving access to online education for all pupils in Vadu kindergarten and school

In October 2020 awarded a sponsorship of 6380 Euro to Save the Children Romania to provide 46 Alcatel tablets connected to internet for 24 months, for all pupils attending Vadu kindergarten and primary school. The donation was publicly endorsed by Omid Ghanadi, the architect for one of the most popular TV social shows in Romania.

Due to Covid-19 protection measures, the ceremony was organized outside the school yard and no children were present. The tablets were given to the School Mayor and teachers and were provided to children after they were carefully disinfected.

The ceremony organized on October 7th, was attended by 5 BSOG 5HDD site and office staff, including Ana Maria Pericleanu, Save the Children personnel, including Gabriela Alexandrescu, director, Omid Ghanadi, school Mayor and teachers.



Media mentioning of BSOG donation:

- <https://www.protv.ro/evenimente/omid-ghanadi-sustine-campania-salvati-copiii-romania-de-dotare-a-scolilor-cu-tablete-pentru-cursuri-la.html>
- <https://www.agerpres.ro/comunicate/2020/10/07/comunicat-de-presa-salvati-copiii--586842>
- <https://spotmedia.ro/stiri/educatie/salvati-copiii-doteaza-scoala-din-vadu-cu-tablete-si-acces-la-internet-alte-40-de-scoli-inca-mai-au-nevoie-de-ajutor>
- <https://stirileprotv.ro/stiri/social/zeci-de-copii-sarmani-din-vadu-au-primit-tablete-pentru-scoala-de-la-salvati-copiii-si-omid-ghanadi.html> (no direct, but BSOG colleagues were part of the story)
- <https://copaculcufaptebune.ro/uncategorized/salvati-copiii-doteaza-scoala-din-vadu-cu-tablete-si-acces-la-internet/>
- <https://romaniaresponsabila.ro/salvati-copiii-romania-doteaza-scoala-din-vadu-cu-tablete-si-acces-la-internet/>

### 4. Preserving local traditions and history by supporting the creation of Corbu 1st monography.

In 2020 we also awarded a sponsorship of 5000 RON (approx. 1000 EURO) for the publishing of Corbu 1st monography. The launching event, organized on March 7th at Cherhana Moesia in Vadu, brought together the authors as well as other local KOLs who presented the importance and value of this document for the local community.



Media mentioning of BSOG donation:

- <https://www.tvlitoral.ro/monografia-comunei-corbu/>
- <https://www.cugetliber.ro/stiri-social-istoria-comunei-corbu-publicata-intr-o-ampla-monografie-397603>
- <https://www.ziuaconstanta.ro/stiri/cultura/eveniment-editorial-monografia-comunei-corbu-o-calatorie-prin-istorie-713238.html>
- <https://www.facebook.com/centrulculturalcorbu/posts/2757300281018667>

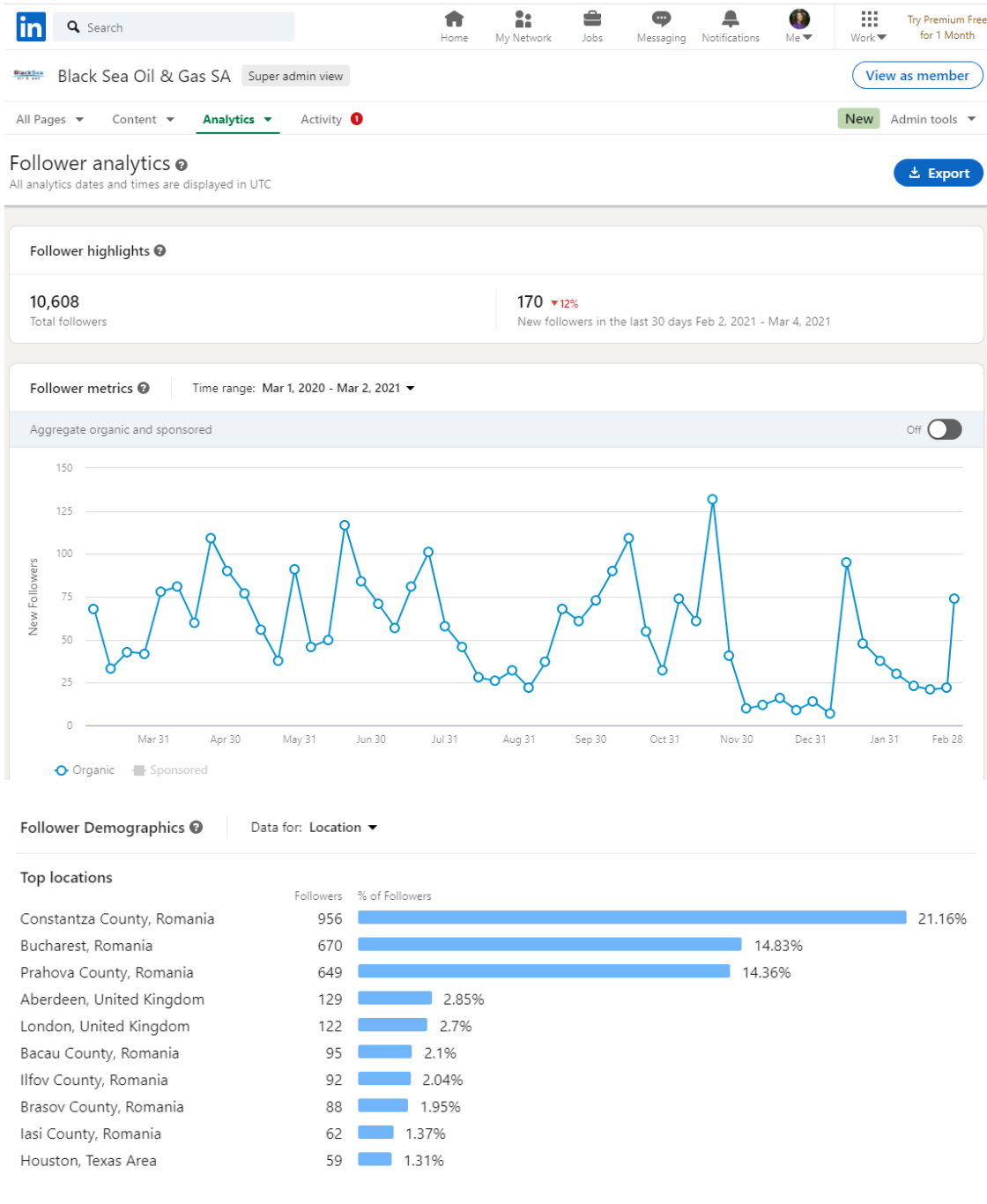
## 5. Christmas gifts to Vadu school pupils

2020 was the fourth year in a row when BSOG became Santa for Vadu school pupils, despite the pandemic restrictions which did not allow direct interaction with the children. Gifts consisting of a puzzle adequate to the age group, book, sweets, toy, personalized wooden globe, MGD bag (total value 1000 EUR) were delivered to Vadu schoolteachers who went with a dressed Santa home to each of the Vadu pupils to offer them. All were delighted to see that BSOG Santa reached them in the pandemic year.



# APPENDIX F Social media coverage and press releases in 2020

## LinkedIn Statistics (data retrieved on 05.03.2021)





## Mass Media coverage for 2020:

Update article: 31.01.2020, 08:37

**EXCLUSIV** Mark Beacom (BSOG), despre Neptun Deep: Căutam oportunități de extindere în zona Mării Negre. Orice companie interesată să preia participația Exxon va insista însă pe restabilirea drepturilor încălcate de Legea offshore

**MUST READ**

566 place 0 comentarii 0 persoane apreciază asta. Înscrie-te pentru a vedea ce le place prietenilor tăi.



Florin Rusu  
 scris 31 Ian 2020



Black Sea Oil & Gas (BSOG) este interesată de orice oportunitate de extindere în regiunea Mării Negre, cu precădere de acelea care pot utiliza infrastructura pe care compania o construiește pentru actualul său proiect, Midia, a declarat, pentru Profit.ro, CEO-ul companiei deținute de fondul de investiții Carlyle, Mark Beacom, răspunzând unei întrebări referitoare la un posibil interes al companiei pe care o conduce în achiziționarea participației ExxonMobil în Neptun Deep.

Potrivit unor surse din piața energetică, BSOG se numără, alături de alte Lukoil, Mol sau Cox LLC, printre companiile care au cerut acces la camera de date deschisă de ExxonMobil în vederea vânzării fie a participației, fie a companiei care deține participația americanilor la Neptun Deep. Un consorțiu format de OMV Petrom, Romgaz și polonezii de la PGNiG, în schimb, consultă datele la camera deschisă de OMV.

"BSOG nu poate comenta asupra achizițiilor de active pe care le are în vedere. Mandatul nostru este să căutam oportunități de extindere în regiunea Mării Negre, în special acele oportunități care implică dezvoltarea descoperirilor de gaze offshore unde infrastructura pe care o construim pentru proiectul MGD ar putea fi cel mai bine utilizată", a răspuns Marc Beacom la o întrebare adresată de Profit.ro privind un posibil interes al companiei pe care o conduce în participația Exxon.

# Mark Beacom, BSOG: Căutam oportunități de extindere în regiunea Mării Negre, în special care implică dezvoltarea descoperirilor de gaze offshore



Black Sea Oil & Gas nu poate comenta asupra achizițiilor de active pe care le are în vedere, ne-a transmis Mark Beacom, CEO BSOG, după ce Financialintelligence.ro a relatat, pe surse, că Lukoil PJSC, MOL Oil and Gas PLC, Black Sea Oil & Gas și Cox LLC au avut acces la camera de date a

### FIELD DEVELOPMENT

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### Romanian player eyes Black Sea first gas next year

Black Sea Oil & Gas on time and on budget at the \$400 million gas field development

3 February 2020 12:13 PM 100% 100% 3 February 2020 12:13 PM

By Newsroom/Source: ENL - Law

Black Sea Oil & Gas (BSOG) is moving ahead with its \$400 million Midia gas field development plan off Romania, expecting production to begin next year, as the offshore law regulating activities is being altered.

The Romanian Independent announced a final investment decision for the Black Sea project in February last year, and has since then been "advancing on all fronts", it said.

The Midia project is planned to consist of five offshore production wells – one subsea well at the Doina field and four wells drilled from the platform at the Ana field – and a subsea gas production system over the Doina well, which will be connected through an 18-kilometre pipeline with a new unmanned production platform located over the Ana field.

"The Ana platform is under construction at local contractor GSP's Agigea cityport, the mobilisation works are under way at the Gas Treatment Plant site at Vidui, major fabrications efforts including the onshore and offshore pipeline, gas compressor, control units, umbilicals, wellheads are either completed or are well advanced," a spokeswoman for BSOG told Upstream.

The company's plans also include a 120-kilometre gas pipeline that will link the Ana platform to shore and to a new onshore gas treatment plant in the nearby town of Corbu, in Constanta county, with capacity of 1 billion cubic metres per annum.

"Preliminary operations and drilling are scheduled for later this year," BSOG said, adding that production is expected to begin in the first half of 2021.

#### RELATED NEWS

BSOG gains approval for Midia plan off Romania

17 February 2020 12:13 PM

Romania passes offshore law

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Romania wants ExxonMobil's Black Sea interest for state

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OPINION: Protest votes keep Iohannis in power in Romania

27 November 2019 18:54 PM

ExxonMobil tests market interest for Romania's Neptun Deep

23 November 2019 11:23 AM

**EXCLUSIV** Marc Beacom (BSOG): În 2021 începem producția în Marea Neagră. Dacă Legea offshore nu este modificată până atunci, nu excludem o acțiune juridică

**MUST READ**

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Florin Rusu  
 scris 3 Feb 2020



CEO-ul Black Sea Oil & Gas (BSOG), Mark Beacom, preconizează că producția în perimetrul Midia (offshore) va începe în prima jumătate a anului viitor, însă avertizează că, dacă până la acel moment nu va fi modificată Legea offshore, BSOG poate deschide o acțiune juridică împotriva statului român.

**Înainte de a fi prezentată aici, informația a fost anunțată cu mult înainte de Profit Insider**

În februarie, BSOG a dat un set de investigații în gazele din Marea Neagră, la câteva zile după ce se plăngea de noile taxe din România.

Recent, ministrul Economiei și Energiei, Virgil Popescu, estimează că producția în Marea Neagră ar putea începe în 2022, cu condiția ca Parlamentul să modifice Legea offshore în următoarea sesiune.

"Producția de gaze din proiectul MGD este preconizată să înceapă în prima jumătate a anului 2021. Până atunci vom lucra cu toate autoritățile relevante pentru restabilirea drepturilor noastre fără a fi nevoi să recurgem la acțiuni juridice. În situația în care sursem pe punctul de a începe producția și nu înțelegem restabilirea drepturilor noastre, nu vom exclude posibilitatea de a urma o acțiune juridică", spune pentru Profit.ro.

# ZF Best of Power Summit 2020. Black Sea Oil & Gas: Nu exportul de gaze ar trebui văzut ca un lucru rău, ci importul. Este important ca gazul din Marea Neagră să fie scos și băgat în sistem

Ami place Dislike Tweet Share Print Mail



Mark Beacom, CEO-ul Black Sea Oil & Gas (BSOG) Pentru a atinge obiectivul Green Deal (zero emisii la nivelul anului 2050 în UE - n-red) gazul nu este parte a problemei, ci parte a soluției. Potrivit studiilor, cererea de gaz va crește, însă va intra mai apoi pe un trend descendent până în 2040. Marea Neagră are în acest moment, cu toate investițiile făcute în explorare, circa 150 mld. metri cubi de gaz. Gazul este o parte a soluției și o oportunitate ușoară pentru economia României.

Autor: Roxana Petrescu, Răzvan Botea 13.03.2020, 17:32 104

Mark Beacom, CEO-ul Black Sea Oil & Gas (BSOG), spune că cererea de gaz va crește în contextul Green Deal și al obiectivului de zero emisii la nivelul anului 2050. Astfel, gazul va deveni o oportunitate și o parte a soluției pentru atingerea țintelor asumate la nivel european. Există însă o condiție: gazul trebuie scos și injectat în conducte.

„În acest business, pare să fie o îngrijorare: ce se va întâmpla dacă România exportă gaz? Exportul este văzut ca un lucru foarte rău. Nu pare să fie așa mare îngrijorarea pentru cazul în care România ajunge să importe gaz. Abia acest lucru, în opinia mea, ar fi foarte rău. Cred că este foarte important să scoatem gazul din subsol și să-l introducem în sistemul românesc”, a spus Mark Beacom, directorul general al Black Sea Oil & Gas (BSOG), compania din spatele primului proiect de explorare și exploatare de hidrocarburi din Marea Neagră lansat în România după 1989. Declarația a fost făcută în cadrul celei de-a noua ediții a ZF Power Summit.

## PROFIT.ro ȘTIRI MUST READ POVEȘTI CU PROFIT PERSPECTIVE TAXE ȘI CONSULTANȚĂ PROFITUL

### EXCLUSIV După ce anunțase începerea producției de gaz în proiectul MGD din Marea Neagră în 2021, BSOG - un nou mesaj: își va adapta planurile în funcție de evoluția pandemiei și a cotațiilor externe

ENERGIE Ami place Dislike 11 persoane apreciază asta. Înscrie-te pentru a vedea ce ai plăcut prietenilor tăi.



Florin Rusu scris 25 mar 2020

f t in

Black Sea Oil & Gas (BSOG), care anunțase în prealabil începerea producției de gaz în proiectul MGD din Marea Neagră în 2021, susține că și va adapta planurile în funcție de evoluția evenimentelor, și anume a pandemiei de Coronavirus și a cotațiilor internaționale la petrol și gaze.

„Deși astăzi intenția noastră este să continuăm să avansăm operațiunile, lucrurile evoluează rapid, iar BSOG monitorizează îndeaproape evenimentele și va pune în aplicare noi planuri, potrivit noilor realități”, a declarat CEO-ul BSOG, Mark Beacom, pentru Profit.ro.

La începutul lunii februarie, Beacom preconiza că producția în perimetrul Mădia (MGD) va începe în prima jumătate a anului viitor, însă avertiza totodată că, dacă până la acel moment nu va fi modificată Lega offshore, BSOG poate decide o acțiune juridică împotriva statului român.

**CITEȘTE ȘI** OMV Petrom estimează un profit în scădere cu 21% la un preț al barilului dublu față de cel actual! Orice ieftinire cu 1 dolar a țeței va avea un impact negativ de 20 de milioane de euro

Între timp în România a fost instaurată starea de urgență și impusă o

# Mark Beacom, CEO Black Sea Oil & Gas: În T1/2021 vom face primele extracții de gaz din Marea Neagră

ZF Power Summit 2020 Ami place Dislike Tweet Share Print Mail



Autor: Cristina Bellu 18.02.2020, 11:08 353

Mark Beacom, CEO Black Sea Oil & Gas, a afirmat în cadrul evenimentului ZF Power Summit 2020 că primele extracții de gaz din perimetrul Mădia al Mării Negre s-ar putea realiza în primul trimestru al anului viitor.

„Investiția totală în proiect este de 400 mil. dolari. Până acum am cheltuit 200 mil. de dolari pentru exploatare și încă 200 mil. dolari pentru a extrage primele molecule de gaz. Sperăm să recuperăm întârzierile. Probabil că în T1/2021 vom vedea primele extracții”, a spus Mark Beacom.

## Upstream Latest News Regions FIELD DEVELOPMENT LNG Energy Transition e-paper



### Black Sea gas project Mădia moving ahead with 'constraints'

Carlyle group backed BSOG says situation 'very fluid' amid Covid 19 outbreak

28 March 2020 9:28 GMT | 1474767 | 28 March 2020 9:28 GMT  
By Kenneth Detken - London

Carlyle Group-backed Black Sea Oil & Gas (BSOG) is moving ahead with its \$400 million Mădia gas field development plans off Romania but admits 'constraints' as the Covid-19 pandemic spreads.

BSOG is expecting production to begin in the first half of next year, after announcing a final investment decision on the project in February 2019.

The Romanian independent, however, has been faced with 'challenging times' amid both the coronavirus pandemic and a collapse in commodity prices.

"Since the first reports of the Covid-19 outbreak in the news, BSOG has followed the developments closely and immediately took measures to ensure the health and safety of its staff, as a consequence all our office based staff works from home", chief executive Mark Beacom said.

"BSOG's current plan is to continue to move forward and progress its offshore Mădia gas development project where it can, whilst ensuring the safety and health of its staff and contractors based at the work site are not compromised, and also to move forward with the best of its abilities under the constraints it is facing."

"Although it is our intention today to continue to move forward, the situation is very fluid and BSOG is monitoring events closely and will implement plans as appropriate," Beacom said.



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Work progress: pipe storage in Midia base Photo: BSOG

## Black Sea gas scheme forges ahead off Romania

BSOG says project completion is now over 30%, with first gas still expected in 2021 from Midia project

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## Romanian player eyes Black Sea first gas next year

Field Development  
3 February 2020 11:13 GMT

## Romania wants ExxonMobil's Black Sea interest for state

Finance  
17 January 2020 12:54 GMT

4 June 2020 9:02 GMT UPDATED: 5 June 2020 15:37 GMT

By Anamaria Dedulesa [✉](#) in London

Romanian independent Black Sea Oil & Gas (BSOG) is forging ahead with development of its domestic flagship Midia gas project in the Black Sea, where it aims to start production next year.

BSOG, together with co-venture partners Petro Ventures Resources and Gas Plus International, completed the transportation of 147 kilometres of pipe from Greece to its storage yard in Romania's Constanta on the Black Sea coast during lockdown in the country due to the Covid-19 pandemic.



## Romania's oil and gas industry warns of Covid-19 impact as lockdown hits

[Read more](#)

## Covid-19 measures

The transport was handled by Greek player Corinth Pipeworks, which introduced preventative measures in response to the pandemic to protect employees, communities, suppliers and customers — measures that included setting up crisis management and re-operation teams.

The services company focused on minimising the probability of infection for its personnel by reducing physical interactions and implementing a mandatory disinfection programme.

The company also prepared an emergency response plan in case of Covid-19 infection of employees and third-party visitors, while also maintaining high levels of production, operations and project execution.

## Black Sea Oil &amp; Gas: Cred că este foarte important să scoatem gazul din subsol și să-l introducem în sistemul românesc

13 apr 2020

Autor: Răzvan Botea



Explorările actuale arată că în Marea Neagră există în acest moment cel puțin 150 de miliarde de metri cubi de gaze naturale. România consumă anual 10 miliarde de metri cubi de gaze provenite, în cea mai mare parte, din producția internă. În acest context, nu exportul gazului din Marea Neagră ar trebui să sperie opinia publică locală, ci pericolul de a deveni importatori dacă proiectele de exploatare rămân blocate.

Mark Beacom, CEO al Black Sea Oil & Gas (BSOG), spune că cererea de gaz va crește în contextul Green Deal și al obiectivului de zero emisii la nivelul anului 2050. Astfel, gazul va deveni o oportunitate și o parte a soluției pentru atingerea țintelor asumate la nivel european.

**BSOG începe instalarea conductei ce va aduce la țărm gazele din perimetrul Midia din Marea Neagră: "Mergem pe premisa că Legea offshore va fi îmbunătățită, insistăm pentru revocarea unor măsuri ostile."**

ENERGIE

În plus Distribuie 0 persoane apreciază asta. Înscrie-te pentru a vedea ce le place prietenilor tăi.



Adi Morosianu  
scris 13 aug 2020



Compania petrolieră Black Sea Oil&Gas (BSOG), controlată de grupul american de asset management Carlyle, singurul concesionar de perimetre de gaze naturale din Marea Neagră care a luat până în prezent decizia finală de a investi în offshore-ul românesc, își menține obiectivul de a demara anul viitor producția de gaze pe concesiunea Midia, în pofida problemelor cauzate de pandemia de COVID-19, iar lucrările la proiect avansează pe premisa că prevederile "ostile" investițiilor din Legea offshore vor fi modificate de autoritățile de la București.

**CITEȘTE ȘI FOTO** Oportunitate de investiție - OMV Petrom vinde un teren într-o zonă extrem de căutată, pe care poate fi dezvoltat un proiect imobiliar mixt

"Stadiul de realizare a proiectului este în prezent la 33% și considerăm în continuare că obiectivul de a demara producția de gaze în 2021 este fezabil", a declarat, pentru S&P Global Platts, directorul general al BSOG, Mark Beacom.

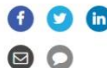
**Mark Beacom (BSOG) cu ocazia începerii lucrărilor la conducta submarină Midia: Legislația ostilă adoptată în 2018 ar trebui să dispară complet"**

ENERGIE

În plus Distribuie 0 persoane apreciază asta. Înscrie-te pentru a vedea ce le place prietenilor tăi.



Florin Rusu  
scris 17 sep 2020



Există mai multe țări riverane la Marea Neagră (interesate de exploatarea offshore a gazelor naturale - n.r.) și sunt multe care ar vrea să ajungă în punctul în care se află România, a avertizat CEO-ul Black Sea Oil & Gas, Mark Beacom, cu ocazia începerii lucrărilor la conducta submarină care va face legătura între proiectul de dezvoltare gaze naturale Midia-MGD și Sistemul Național de Transport (SNT). Pentru ca România să-și păstreze avantajul competitiv câștigat în raport cu statele vecine trebuie ca "legislația ostilă adoptată în 2018 să dispară complet".

Șeful BSOG s-a referit la majorarea impozitării prin legea offshore și restricțiile impuse la export prin același act normativ.

Declarația a fost făcută în condițiile în care la lansarea lucrărilor erau prezenti premierul Ludovic Orban, ministrul economiei și energiei Virgil Popescu, dar și șeful Transgaz, Ion Sterian, și cel al Autorității Naționale de Reglementare în Domeniul Energiei (ANRE), Dumitru Popescu.

## Mark Beacom, BSOG: România trebuie să se asigure ca își produce propriul gaz și să înceteze importurile



"Sper ca, până începem producția din Marea Neagră, să fie abrogat impozitul suplimentar pentru exploatarea offshore"  
 \* Beacom: "Noi vindem tot gazul către Engie, la prețul pieței, iar Engie îl vinde mai departe. Nimeni nu știe cât va fi prețul gazului, când vom intra în producție"  
 \*Gabriel Comănescu, GSP: Urmează Neptun Deep și Trident: Cu aceste exploatarea, România poate deveni exportator net de gaze  
 România trebuie să se asigure că își produce propriul gaz și să înceteze importurile, a spus, azi, Mark Beacom, CEO Black Sea Oil and Gas, la începerea lucrărilor la conducta submarină din cadrul proiectului de dezvoltare gaze naturale Midia - MGD.

**PROFIT ENERGY.FORUM Mark Beacom: BSOG a finalizat conducta de traversare subterană a plajei de la Vadu**

ENERGIE

În plus Distribuie 0 persoane apreciază asta. Înscrie-te pentru a vedea ce le place prietenilor tăi.



Florin Rusu  
scris 8 oct 2020



Black Sea Oil & Gas a terminat miercuri noapte lucrările la conducta de 1,5 km de traversare subterană a plajei de la Vadu, aceasta fiind prima lucrare de acest gen din România, a anunțat la videoconferința Profit Energy forum - Energia post-Coronavirus, Mark Beacom, CEO-ul BSOG.

Potrivit șefului BSOG, operațiunea a fost realizată onshore de către un antreprenor român de foraj, Cala, și a fost recepționată primitiv în larg de mai multe de nave românești deținute de Grup Servicii Petroliere (GSP), inclusiv BigfootF1 și Olivia.

Beacom susține că această operațiune, precum și toate lucrările care au fost efectuate în timpul stării de urgență la șantierul naval Agigea, baza Midia și șantierul de construcție din Vadu, demonstrează în mod clar că și în contextul pandemiei Covid-19, cu regimuri stricte, aceste operațiuni pot continua cu succes chiar și atunci când economiile țărilor din timpul pandemiei sunt în cădere liberă.



## Doi giganți bancari francezi finanțează extracția gazelor românești din Marea Neagră

ENERGIE

Imi place

Distribuie

132 de persoane apreciază asta. Înscrie-te pentru a vedea ce le place prietenilor tăi.



Adi Mosoianu

scris 3 dec 2020



Doi giganți bancari francezi, unul dintre ei inclusiv prin intermediul subsidiarei sale din România, s-au implicat în finanțarea costurilor de dezvoltare a celui mai avansat proiect de exploatare de gaze naturale din Marea Neagră, singurul în privința căruia a fost luată decizia finală de investiție și la care lucrările se află într-un stadiu avansat.

### Înainte de a fi prezentată aici, informația a fost anunțată cu mult înainte pe Profit Insider

Astfel, divizia din Londra a Societe Generale (SocGen), împreună cu subsidiara românească BRD a SocGen și cu "brațul" de investment banking al Credit Agricole se numără, alături de Banca Europeană de Reconstrucție și Dezvoltare (BERD), printre aranjorii și împrumutătorii inițiali ai unui contract de facilitare multiplă de credit de tip revolving încheiat cu concesionarii perimetrului offshore de gaze naturale Midia din Marea Neagră la finalul anului trecut, indică un document oficial analizat de Profit.ro.

Sursa citată relevă că valoarea facilității este de 200 milioane euro și destinată, printre altele, finanțării costurilor de forare, dezvoltare, construire, testare, producție, funcționare, gestionare și întreținere a zăcămintelor de gaze Ana și Doina din perimetrul Midia. Acesta este concesionat de către Black Sea Oil&Gas, care deține 65% din drepturi și calitatea de operator, Petro Ventures Resources (20%) și Gas Plus (15%).

# Youtube Statistics (retrieved on 05.03.2021)

Studio

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**BlackSea**  
oil & gas

Your channel  
BSOG

- Dashboard
- Content
- Playlists
- Analytics
- Comments
- Subtitles
- Copyright
- Monetisation
- Customisation
- Audio library
- Settings
- Send feedback

## Channel analytics

ADVANCED MODE

2 Aug 2018 – 3 Mar 2021  
Lifetime

Overview
Reach
Engagement
Audience

### Your channel has had 17,186 views so far

Views ▲ <b>17.2K</b>	Watch time (hours) ▲ <b>545.4</b>	Subscribers ▲ <b>+83</b>
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[SEE MORE](#)

### Your top videos in this period

Video	Average view duration	Views
1  BSOG campania de foraj de explorare, Marea Neagra, 2018 2 Aug 2018	1:33 (60.3%)	376
2  Black Sea Oil & Gas MGD Project presentation movie - full details 6 Nov 2018	2:20 (32.0%)	129

#### Realtime

Updating live

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**84**  
Subscribers

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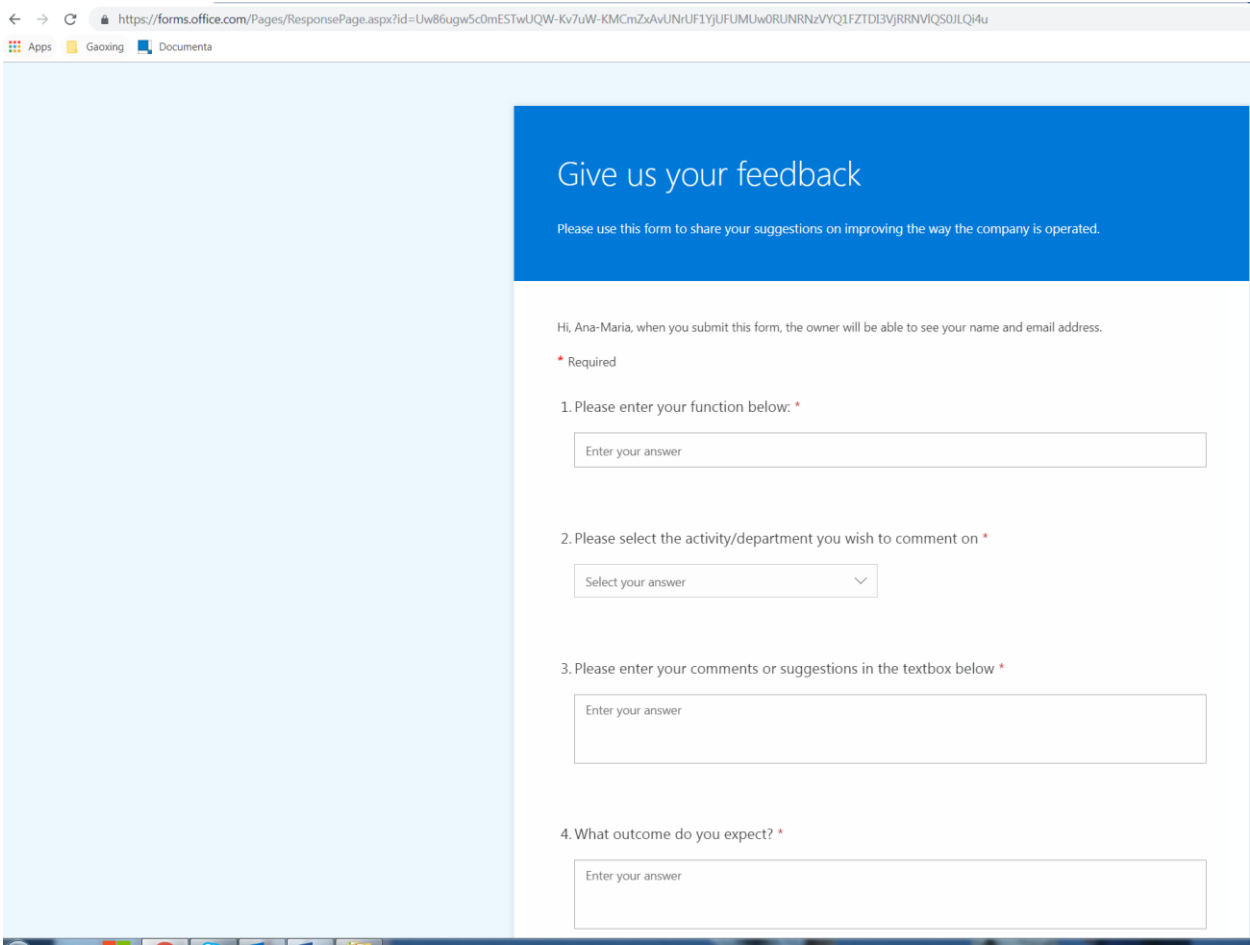
**65**  
Views · Last 48 hours

Top videos

- BSOG campania de foraj de ... 30
- Black Sea Oil & Gas MGD Pr... 16
- Black Sea Oil & Gas MGD proj... 7

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# APPENDIX G Feedback form on BSOG intranet for employees



# APPENDIX H Employee engagement in CSR activities and internal announcements

Eveniment scoala Vadu miercuri, 7 octombrie, orele 13:00



Ana-Maria Pericleanu

To: Sorin Aftinic; Sergiu Corneș; Catalin Stefan; Cristian Olteanu; Mihaela Manea; Bogdan Tadiu; Bogdan Gutu; Gabriela Nicolae; Octavian Ionescu

Reply Reply All Forward

Mon 10/5/2020 5:01 PM

Buna, dragilor,

Miercurea aceasta avem un scurt eveniment realizat cu Salvatii Copiii Romania la scoala din Vadu prin care donam elevilor scolii tablete pentru invatarea online.

Cum actualul context pandemic nu ne permite sa intram in scoala, nici macar in curtea scolii (ordonanta de Ministru), incercam sa facem aceasta predare de tablete la intrarea in curtea scolii, frontal sau lateral.

Ce rugamintea am la voi, sa desemnati cel putin o persoana de la fiecare din cele doua santiere, care isi permite sa lipsasca de la post max o ora, careia ii plac copii, are abilitati sociale si vine echipata cu PPE complet. Avem si o vedeta prezenta, veti vedea la fata locului cine este.

Idee este ca, daca sunt prezente si persoane de la santiere, asta genereaza in mintea lor o constientizare a faptului ca tabletele vin de la santiere si ca prezenta santierelor in sat este un lucru bun. Plus ca, poate apare un soi de admiratie fata de ceea ce faceti voi si isi stabilesc vise mai inalte decat ingrijirea animalelor si a gospodariei ori lucrul in constructii in Italia sau Spania.

@Sorin Aftinic, adu-mi, te rog, spider-ul in husa neagra de la biroul de la Constanta. Nu stiu daca o sa fie fezabil sa-l plasez undeva, insa mai bine sa-l avem decat sa nu-l avem. Bogdan Tadiu aduce doua steaguri de la HDD.

Evenimentul va avea loc la orele 13:00 la scoala din Vadu si vom avea si fotograf.

Hai sa facem efortul asta pentru copii din Vadu!

Multumesc,

Ana-Maria Pericleanu

Communications & CSR Manager

Black-Sea Oil & Gas SA

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www.blackseooil.com

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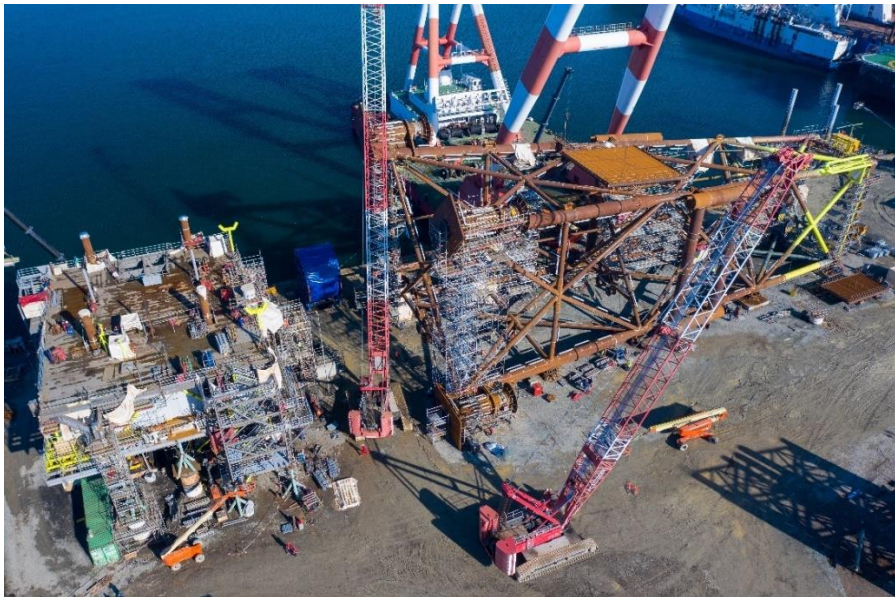


**APPENDIX I Photo report of the works carried out in 2020**

**Picture 1 Ana platform - Jacket load out - Agigea**



**Picture 2 Construction of Ana Platform in Agigea**



**Picture 3 and 4 Gas Treatment Plant in Vadu**



**Picture 5 HDD site on Vadu Beach**





**Picture 6 and 7 Pipeline laying in Vadu**

